



"Nyhart, Nicholas"  
<NNyhart@publiccampaign.org  
>  
10/01/2007 11:04 AM

To <wrtl.ads@fec.gov>  
cc  
bcc  
Subject Comments on Notice 2007-16 Electioneering  
Communications



October 1, 2007

By **Electronic Mail** (wrtl.ads@fec.gov)

Mr. Ron B. Katwan  
Assistant General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

**Re: Comments on Notice 2007-16: Electioneering Communications**

Dear Mr. Katwan:

These comments are submitted by Public Campaign in response to the Notice of Proposed Rulemaking (NPRM) on "Electioneering Communications." See NPRM 2007-16, 72 Fed. Reg. 50261 (August 31, 2007). In the Notice, the Commission requests comments on proposed revisions to its rules governing electioneering communications, in order to implement the Supreme Court's decision in *FEC v. Wisconsin Right to Life, Inc.*, 127 S. Ct. 2652 (2007) ("WRTL II").

Public Campaign is a national organization working in nearly thirty states around the country on behalf of public financing for municipal, state, and federal campaigns. Regardless of our primary focus on public financing, we believe that disclosure is an essential element of any campaign finance system. Disclosure enhances transparency and can provide citizens with the information to determine how to vote or respond to calls for grassroots lobbying. The necessity of disclosure was upheld in both *McConnell v. FEC*, 540 U.S. 93(2003) and *Buckley v. Valeo*, 424 U.S. 1 (1976). The Court indicated that the burdens imposed on those required to comply with disclosure requirements is greatly different from the burdens imposed in provisions that place limits on campaign contributions and expenditures. The Court has held that reporting requirements serve broader governmental interests and are less burdensome than restrictions on expenditures.

For these reasons, I urge the Commission to retain the extant disclosure requirements for all ads that meet the definition of “electioneering communication.” I appreciate the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Nyhart". The signature is fluid and cursive, with the first name "Nick" and last name "Nyhart" clearly distinguishable.

Nick Nyhart  
President and CEO

Nick Nyhart  
President and CEO  
Public Campaign  
CT Office: 860-349-6935  
DC Office: 202-293-0222