

"Rogers Helen F" <Helen.F.Rogers@irscounsel. treas.gov>

11/13/2007 07:20 AM

To <bundling07@fec.gov>

cc "Blumenfeld Michael B"

<Michael.B.Blumenfeld@IRSCOUNSEL.TREAS.GOV>

bcc

Subject Notice 2007-23

Dear Ms. Rothstein:

Thank you for providing us a copy of the request for comments on the FEC's proposed rules implementing the new statutory provisions regarding the disclosure of information about bundled contributions provided by certain lobbyists and registrants. I am attaching our comments. We are also sending the signed original letter via regular mail.

If you have any questions or concerns regarding our comments or other related matters, please feel free to contact Michael Blumenfeld at (202) 622-7103 or me at (202) 622-6902. <<FECcoordbundling-lobbyists (2) mbb.doc>>



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DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE WASHINGTON, D.C. 20224

November 13, 2007

VIA E-MAIL & REGULAR MAIL

Ms. Amy L. Rothstein Assistant General Counsel Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: Notice 2007-23 Reporting Contributions Bundled by Lobbyists,
Registrants and the PACs of Lobbyists and Registrants

Dear Ms. Rothstein:

Thank you for sending to us a copy of the Notice of Proposed Rulemaking (NPRM) implementing new statutory provisions regarding the disclosure of information about bundled contributions provided by certain lobbyists and registrants. Pursuant to 2 U.S.C. § 438(f), the Federal Election Commission and the Internal Revenue Service are to "consult and work together to promulgate rules, regulations, and forms which are mutually consistent."

Please be advised that we believe the proposed rules do not pose a conflict with the Internal Revenue Code or the regulations thereunder. If you would like to discuss any the issues involved, please feel free to call Helen Rogers at (202) 622-6070 or me at (202) 622-7103.

Sincerely,

Michael B. Blumenfeld Senior Technician Reviewer Exempt Organizations Branch 2 Office of the Division Counsel/Associate Chief Counsel (Tax Exempt & Government Entities)