



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 2000

MEMORANDUM

TO: The Commission
General Counsel
Staff Director
Public Information
Press Office
Public Records
Data Systems Development
Reports Analysis Division
Audit Division

FROM: Rosemary C. Smith *RCS*
Assistant General Counsel

SUBJECT Comments on Notice of Proposed Rulemaking Election Cycle Reporting

Attached please find two timely comments submitted in response to the above Notice of Proposed Rulemaking published on May 3, 2000 (65 FR 25672). The comment period ended on June 2, 2000.

Attachments

cc: Associate General Counsel for Policy
Congressional Affairs Officer
Executive Assistants



"Carney, Eliza" <ecarney@nationaljournal.com> on 06/01/2000 01:56:31 PM

To: ECycleReport@FEC
cc:

Subject: Comment on Proposed Rulemaking

Dear FEC:

I am writing to register my opposition to the proposal that the FEC stop requiring year-end reports. As a reporter tracking political money, I find the year-end category indispensable in unraveling basic information on who's giving what to candidates and parties. As you are aware, many political committees file monthly reports. It is very labor intensive to look through these reports month by month to come up with aggregate figures.

Let's take some specific examples. Assume that a reporter wants to find out how much John Doe, the CEO of Fantastic Cars Inc., gave to the DCCC in 1999. If John Doe happens to have made a contribution in December, a glance at the year-end report shows that Doe gave X amount in December, and Y amount in the "Year to Date" category. Thus we know at a glance what John Doe gave in all of 1999, without having to scroll through 12 months' worth of microfilm or computer records.

Or perhaps a reporter wants to see how much the party committee raised and spent overall in 1999. A glance at the year-end report answers the question. Without it, the reporter would have to spend hours going through reports for every single month of the year. This becomes even more burdensome when one notes that many political party committees, such as the DCCC, have multiple accounts. In short, eliminating the year-end report places an undue burden on voters, journalists and others who have an interest in tracking political money. I would advise against eliminating this requirement.

Sincerely yours,

Eliza Newlin Carney
Staff Correspondent
National Journal



Cheryl Fowle <cfowle@fec.gov> on 06/07/2000 02:09:18 PM

To: ECycleReport@FEC
cc:

Subject: RE: comments to ecyclereport@fec.gov

----- Forwarded by Cheryl Fowle/FEC/US on 06/07/2000 02:14 PM -----

"Carney, Eliza" <ecarney@nationaljournal.com> on 06/07/2000 01:40:39 PM

To: Cheryl Fowle/FEC/US@FEC
cc:

Subject: RE: comments to ecyclereport@fec.gov

In response to your query for additional information:

Please note that my full name, address and telephone number are as follows:

Eliza Newlin Carney
Staff Correspondent
National Journal
1501 M St., N.W.
Wash., D.C. 20005
Tel. (202) 739-8437

If you need additional information please let me know. Many thanks.

-- Eliza Newlin Carney

-----Original Message-----

From: Cheryl Fowle [mailto:cfowle@fec.gov]
Sent: Tuesday, June 06, 2000 10:43 AM
To: Ecarney@nationaljournal.com
Subject: comments to ecyclereport@fec.gov

Thank you for your message regarding the Notice of Proposed Rulemaking regarding election cycle reporting by authorized committees.

When it invites comments on proposed rules, the Commission makes every effort to give all of the comments it receives equal consideration. As part of this effort, the Commission requires all commenters to identify themselves and allow their identities to be made part of the public record.

Since comments received by regular mail nearly always contain the full name and

postal service address of the commenter, the Commission has established a policy of requiring electronic mail commenters to include their full name and postal service address in their comments.

While the Commission welcomes your input, we note that your message did not contain all of the required information. Consequently, if you wish to have your comments considered, it will be necessary for you to send us a message containing this additional information.

Once again, the Commission thanks you for your interest, and encourages you to submit this additional information as soon as possible. If you have any questions, please feel free to contact us at ecyclereport@fec.gov

POGO

Project On Government Oversight
Watchdog since 1981

May 22, 2000

Rosemary Smith
Assistant General Counsel
999 E Street, NW
Washington, DC 20463

Dear Mrs. Smith,

The Project On Government Oversight, POGO, would like to issue comments regarding the recent proposed rule issued by the Federal Election Commission, entitled "Election Cycle Reporting by Authorized Committees." The notice is numbered 2000-9.

The FEC currently groups data in two calendar year intervals, rather than by two- and six-year campaign-cycles. POGO has advocated to change these reporting periods for a number of years, beginning with the recommendation in our report, "Re-Establishing Institutional Integrity at the FEC," which we issued in March of 1998. Our investigation and subsequent report highlighted the problems of reviewing or searching FEC records, especially for U.S. Senate candidates, to list those PAC and individual contributions which have been reported for a specific election. The current FEC listings require the public (and Reports Analysts) to search in at least three different databases to determine if an individual or PAC had exceeded the limit for an election. As a result, it is nearly impossible to determine violations of contribution limits.

These proposed Rules directly correct this problem. Therefore, POGO, fully support the implementation of these proposed rules.

Sincerely,



Danielle Brian
Executive Director