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July 8, 2009

Mr. Robert Hickey
Staff Director
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Mr. Hickey:

In response to the Commission's July 1, 2009 request for public comments, I write to suggest three modest improvements to the Commission's Web site.

First, the Commission should add a "Locate in Result" function to the Advisory Opinion and Enforcement Query System search engines that would allow users to comb through an initial search's results. For example, a user searching for enforcement cases involving the Commission's corporate facilitation regulations at 11 C.F.R. § 114.2(f) could enter "facilitation" as the initial search's term. He or she would then employ "Locate in Result" to sift through the initial search's 48 matching cases by entering secondary keywords, such as "catering," to pin-point cases that involved corporate provision of catering services for a fundraising event. "Locate in Result" would therefore provide a simple and efficient means of pinpointing needed information. "Locate in Result" could be particularly beneficial for the Enforcement Query System as the Commission makes more Matters Under Review available online. Furthermore, commercial research services like Weslaw and Lexis-Nexis already offer this function, so the Commission should find that adding "Locate in Result" is technically feasible.

Second, the Commission should include joint fundraising committees ("JFCs") as a searchable "committee type" for its online search engines. The Disclosure Database, Advisory Opinion, and Enforcement Query System search engines all permit users to search by "committee type." Delegate, House, Senate, and Presidential committees are among the listed search options. JFCs should be added to this list. JFCs were used extensively during the 2008 election cycle and will likely play a prominent role in future fundraising efforts. Because JFC organization and maintenance raises unique issues, the legal and academic community would greatly benefit from an increased ability to find JFC-related records, advisory opinions, and enforcement cases.

Finally, the Commission should make more of its presidential audit reports available online. The current document cache extends back only to 2000. I suggest that the Commission upload all presidential audit reports back to at least 1988, as presidential audits feature in-depth discussion of campaign-finance issues that can assist committees of all types. If more reports are made available online, the Commission should also consider a specialized audit search engine similar to the Advisory Opinion and Enforcement Query System search engines.

Thank you for the opportunity to comment. Please let me know if you have questions about these three brief suggestions.

Sincerely,

Matthew T. Sanderson
Caplin & Drysdale, Chartered