MEMORANDUM

To: **Mr. Robert Hickey, Staff Director, Federal Election Commission**

From: **David B. Magleby, Stephanie Curtis, David Lassen, and Brad Jones, Center for the Study of Elections and Democracy, Brigham Young University**

Re: **Comments Concerning a Proposed Revision of the FEC Website**

Date: **21 July 2009**

We frequently use the Federal Election Commission (FEC) data in our research at the Center for the Study of Elections and Democracy. We appreciate the helpful assistance of FEC staff, who answer our questions in a timely manner. We applaud the efforts of the FEC to improve the web site and expect that in the future it may lessen our need to ask questions of staff. While an improved web site will facilitate academic research and improve the public outreach function of the FEC, there will be a continuing need for user friendly staff to assist with specific technical questions. With respect to specific questions posed in your request for comments we provide the following:

On the organization and navigation of the site:

The current website design requires several clicks to access desired information. We like the easy accessibility of news releases, but have become frustrated with the need to sort through a long list of releases to find desired campaign finance summary tables. It would be helpful if the campaign finance summary data was also available through the campaign finance data section of the website. The "Other Campaign Finance Data" section is a step in the right direction, but not everything is there. Not every type of data summary is available (i.e. PACs, parties, presidential, and congressional summaries) for every year. It would be helpful if every summary table was available for every reporting period. At a minimum, we urge ready access to at least the year-end data for every data summary type.

On the design and layout of the home page:

We like the campaign finance map. It is a quick way to obtain very useful information. We also applaud how the disclosure database search engine is easily accessible from the home page. However, there needs to be a "Campaign Finance Data Summaries" folder added to the "Campaign Finance Reports and Data" tab with subfolders for PACs, parties, candidates (presidential and congressional) added, so that summary data tables for these categories can be easily accessed.

Many of the proposed changes are on the right track, especially a proposal to provide portals on the home page for individuals depending on what type of user they are. These portals would include areas for academics, campaign officials, and the general public. Each portal would emphasize a different set of analysis tools and datasets that would most likely be useful for the

individual.

On how often the FEC might update or change the home page:

Once a good design and layout is found, we recommend that it be changed rarely. It is often frustrating when organizations change their websites too often because users have to learn the site's layout all over again. This is especially true for data-centered sites such as the FEC's. Frequent updates to website data is also crucial, as is providing the data in a timely manner. Major campaign finance press releases are often slow to be posted. Not all major campaign finance data summaries are released every year. The year-end data summaries are often the most important resources for academic researchers and they are not always posted. We urge that the posting of these be made a higher priority.

On the overall ease of use of the site:

It would be helpful if there were quicker ways to find data. The campaign finance map is a step in this direction. Quick and easy menus for PACs, 527s, Parties, Candidates (Presidential and Congressional), etc. would make the site more user-friendly. Making summary tables of campaign finance data easily accessible from these menus would be very helpful. Using the current site, a user has to sort through press releases to find summary tables and not every summary table is provided for every year. Providing easily accessible menus under which all summary tables could be accessed would be a major enhancement.

On data presentation, search engine efficiency:

We recognize that the FEC data base is constantly changing. This is one reason why there are occasional inconsistencies in the data. At the same time, depending on where an individual looks, data for the same individual or organization is at times different. A user can think they are looking up the same data via the campaign finance map or through the disclosure database and yet find different figures. It is even more of a problem when cross-checking data from the FTP site and the main website. Including explanatory footnotes for each table—especially to readily identify what data are included—would greatly improve data presentation. A system of footnoting or flagging which reports have been amended or where the most up-to-date information is on a committee would also be helpful. Another difficulty in this area is the multiple names and committee numbers associated with a single campaign. Grouping all such committees under an easily accessible candidate name, office, and year search (potentially with explanations concerning the function of each associated committee) would improve site use as well. Alternatively, a note could be provided to identify all associated committees.

On raw data storage and downloading of data:

It would be helpful if all FEC data (for every year) was available on the FTP site. We understand that storage space realities may make this difficult. Currently, not every table is in their respective folders, there isn't always a codebook for the tables provided, and not every table is available for every year.

When downloading data it is not always clear how the different fields in the databases were constructed. The uncertainty is troubling, and could be remedied by including technical reports along with each of the files that go into more detail about how the data were brought together. Perhaps these reports already exist. If they do, they should be more accessible. The reports would be most helpful if they went beyond the brief descriptions of the fields that are included with the data files. They should detail the process of assembling the file and make it clear what the data can and cannot be used for. For example, is the date recorded in the file really the date the contribution was made? How much leeway do committees have in submitting their reports? Does the individual file have a record for all contributions over $200 dollars? It would be helpful to understand the whole process of how the files are compiled and what happens to them at each step of the way.

It also would be helpful to know how exactly the different reports are created and how they relate to each other. Is it possible to recreate something approaching the yearend report using the detailed files? If not, what additional information is included in the candidate reports that cannot be found in the detailed files? Similarly, there are several summary files available for download. Can those be reconstructed from the detailed files? If so, how? If not, what is included in the summary files that is not included in the detailed files?

On the presence and extent of educational materials:

It would be helpful if the FEC released a user-friendly version of federal election contribution and spending regulations for each election cycle (i.e. pre-BCRA, post-BCRA, what individuals, parties, PACs, etc. can give to federal candidates, parties, PACs, etc.). Here the committee would do well to emulate the Center for Responsive Politics (CRP). CRP's site, opensecrets.org, has easy to access tables and charts that detail contribution limits, types, etc. We understand that the FEC needs to use appropriate technical and legal language so as to avoid confusion and court proceedings with campaigns and other organizations, but this does not preclude the presence of a more streamlined version of such information as well.