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12/19/2008 12:03 PM

To agencypro2008@fec.gov  
cc  
bcc  
Subject Re: Federal Election Commission Seeks Comment on its  
Activities and Procedures

To the Federal Election Commission:

I am responding to your December 17, 2008, email invitation to provide written comment "on how the Commission might improve transparency, fairness and efficiency in the way it applies and enforces the campaign finance laws over which it has jurisdiction and the regulations it has adopted."

I was Campaign Treasurer for a candidate challenging an incumbent Senator in primary and general elections of 2008. The candidate was a new entry to the federal electoral process. He was proceeding on the basis of a statewide grassroots effort with minimal staffing and little outside funding.

In my experience with this campaign, the single most important way the FEC may "improve transparency, fairness and efficiency in the way it applies and enforces the campaign finance laws over which it has jurisdiction and the regulations it has adopted" is to provide a much better software package for filing reports.

The current software provided -- FECFile -- is clunky and confusing and runs only on a Windows platform. Entries that require input to more than one schedule are not linked, so double (and sometimes triple) input by the user is required. Entries that involve the same date or other field data are not able to be set once, so repeated input of the same data by the user is required. These two examples alone affect almost every item -- contributions, expenditures, loans, etc. -- required for inclusion in quarterly reports.

The free FEC software need not be as fully-featured as commercial packages available to campaigns, but it should be easy to use so that low-budget candidates and committees are able to file reports without recourse to prohibitively expensive applications that include organizing features not needed by such campaigns.

I would like to say that FEC staff were uniformly helpful when I needed to speak with them.

Regards,

Peter d'Errico

Initial Campaign Treasurer, Ed O'Reilly for Senate

Campaign Committee ID: C00435263

Senate ID: S8MA00201

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