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To <SPW2@fec.gov>

cc

bcc

Subject Comments: Salary Allocation & FEA for State and County Committees

To Whom It May Concern:

Please find enclosed my comments on Salary Allocations and FEA for State and Local Party Committees.

Thank you for considering my comments,

Darryl Tattrie
CommonCentsConsulting, LLC



FEC Comments - Salary Allocation - Tattrie.pdf FEC Comments - FEA - Tattrie.pdf

Darryl Tattrie

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Comments of Darryl Tattrie
On the Proposed Regulations Governing
Allocation of Salaries by State Parties

I have been involved in FEC Compliance since 1997 with State Party Organizations. I worked with the Kentucky Democratic Party, the Arizona Democratic Party and most recently I have been helping the Colorado Democratic Party. I offer these comments as an individual and not on behalf of any of the organizations mentioned above.

The legislation passed that require State Party Committees to pay - using 100% federally permissible funds - the salary of any employee who spends more than 25% of their time on federal election activity (FEA) or activity in connection with a federal election may sound good on paper but is not necessarily practical in the field.

For the most part permanent state party staff members would only exceed the current 25% threshold during the even-numbered campaign year with the exception of Special Elections. The Arizona Democratic Party basically split the office into two separate operations. Any staff that performed any FEA were paid using 100% federally permissible funds whether or not these employees had exceeded the 25% threshold. As a result of these uncertainties, the party paid for almost all of its staff exclusively with federal funds during the 2004 campaign season, even in cases where it was likely that they did not work in excess of 25% of a given month in connection with federal activities. All other staff that essentially were support staff or part of the "Legislative Caucus" committee that dealt exclusively with non-federal elections were paid for out of a non-federal account and instructed to not spend any of their time in connection with FEA.

Thank you for consideration of these comments.

Respectfully submitted,

Darryl R. Tattie
CommonCentsConsulting, LLC