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TRANSMITTED BY E-MAIL

October 28, 2005

Brad C. Deutsch
Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Notice of Proposed Rulemaking, "Definitions of
'Solicit' and 'Direct,'" 70 Fed. Reg. 56599 (Sept. 28, 2005)

Dear Mr. Deutsch:

I am writing in connection with the above-referenced matter on behalf of the National Education Association, a nationwide labor organization with more than 2.7 million members, the vast majority of whom are employed in public schools and colleges throughout the United States. We have reviewed the comments being submitted by the AFL-CIO in this matter, and are in complete agreement with them.

Thank you for your consideration of our position.

Sincerely,

Richard B. Wilkof
Legal Counsel

cc:
Diane Shust