



"Darryl Tattrie "
<Darryl@CommonCentsConsulting.net>

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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

CommonCentsConsulting, LLC
PO Box 12011
Casa Grande, AZ 85230

Comments of Darryl Tattrie
On the Proposed Regulations Governing
Definition of Federal Election Activity

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.

Local Party Committees have struggled a great deal to understand post BCRA campaigning and what its affect is on them. In many states, like Kentucky for example, there are a large number of counties (120 in the case of KY) that have a huge turnover in officers. These positions in most cases are unpaid positions and if the County Committee is lucky, the positions may be filled for a cycle at best. The complexity of the BCRA is making it even harder to fill those positions. Standard County Committee duties in the states that I have been involved with include Voter Registration, Voter ID, and Get-Out-The-Vote (GOTV) programs whereby local party organizations planned, organized, and executed these plans in consultation with the state party. In many cases, the state party provided some if not all of the funding for these plans by transferring the appropriate funds directly to the County Committees.

In all fairness with the passing of BCRA, County Committees just don't have the expertise nor the resources to handle the compliance and reporting requirements if they should happen to meet the thresholds for federal filing based on activities that for the most part are all about getting there local mayor, city councilperson, county attorney or dog catcher elected. County Committees in two of the states that I have worked in have MORE restrictive contribution limits than the FEC rules so there is really no way they could even raise the resources to pay for attorney's or Compliance Consultants familiar with BCRA to keep them out of trouble. In essences what BCRA is doing to the County

Committees is making them for all intent and purpose ineffective in the electoral process.

I recommend that the FEC consider amending its regulations to exempt local party organizations from the requirements of FECA.

Thank you for consideration of these comments.

Respectfully submitted,

Darryl R. Tattrie
CommonCentsConsulting, LLC