



FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 14, 2005

MEMORANDUM

TO: The Commission
General Counsel
Staff Director
Public Information
Press Office
Public Records

FROM: Mai T. Dinh *MTD*
Assistant General Counsel

SUBJECT: Untimely Comment for State, District and Local Party Committee
Payment of Certain Salaries and Wages

Attached please find one untimely comment submitted in response to the above Notice of Proposed Rulemaking on State, District and Local Party Committee Payment of Certain Salaries and Wages, Notice 2005-12, published on May 4, 2005 (70 FR 23072). The comment period ended on June 3, 2005.

Attachments

cc: Associate General Counsel for Policy
Congressional Affairs Officer
Executive Assistants



"Lisa Tolk"
<ltolk@utgop.org>
06/14/2005 12:10 PM

To <StatePartyWages@fec.gov>
cc
bcc
Subject Comment on state party wages

The current rules concerning the salaries and wages of state party committee employees should remain intact and should not be changed. The current standard of employees being paid with entirely federal funds when they spend 25 percent or more time on federal-related activities and being paid according to state law during times when they spend less than 25 percent is a reasonable standard because during an off-election year, state parties spend relatively little time on federal elections and much more time on state-related party matters. It is also more difficult to raise federal funds during an off-election year and makes sense to use federal funds to pay wages during the time when employees are focusing on federal elections and raising federal money. If the Commission does need to implement a percentage for wages paid from the federal account, it should be a fixed percentage rather than a percent of each employee's time. It is not reasonable to figure every minute of every employee's time and have different percentages for each employee every pay period. The logistics of monitoring and paying wages according to that method would be complicated and overly burdensome. Implementing an average percentage would be much more reasonable.

Lisa Tolk
Controller
Utah Republican Party
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