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To <SPW2@fec.gov>
cc
bcc
Subject

Pursuant to the reopening of the comment period, please find attached my comments regarding party salary payments. If you have any questions or are unable to open, feel free to call me at 919.832.2666.

Thanks.

Scott Falmlen



FEC Comments - Salary Allocation.pdf

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Comments of Scott Falmlen

On the Proposed Regulations Governing Allocation of Salaries

By State and Local Party Committees

From 1995-1999, I served as Executive Director of the Florida Democratic Party. From 1999-2005, I served as Executive Director of the North Carolina Democratic Party. In addition, from 2001-2005, I served as President of the Association of State Democratic Executive Directors. I offer these comments as an individual and not on behalf of any organization.

The current requirement that state and local party committees pay -- using 100% federally permissible funds -- the salary of any employee who spends more than 25% of their time on federal election activity or activity in connection with a federal election is a sound one and one that is well balanced given the reality of day-to-day state and local party operations.

There has been no abuse of the current regulation. It is very rare occurrence when a permanent state party staff member exceeds the current 25% threshold. On a day-to-day basis, there is very little or no federal election activity or activity involving a federal election involved in dealing with local party organizations about local campaigns and local political issues, writing and disseminating electronic newsletters, organizing state and local party meetings and conventions, working with state legislators on legislative issues, answering telephone inquiries

from the public, ordering office supplies, paying bills, or filing state and federal compliance reports.

Most -- if not all -- activity involving federal election activity and federal elections comes during the course of the state party's Coordinated Campaign effort during the even-numbered campaign year. The Coordinated Campaign is the party's effort on behalf of all Democratic candidates -- local, state, and federal -- on the General Election ballot. In 2004, in fact, to insure complete compliance, the North Carolina Democratic Party paid all of its Coordinated Campaign staff using 100% federally permissible funds whether or not these employees had exceeded the 25% threshold. This effort totaled almost \$450,000 in full-time staff and over \$650,000 in part-time staff.

The old adage "if it ain't broke, don't fix it" applies here. The assertion -- by those with no practical experience in state or local party operations -- that there is abuse in the manner in which the current regulation is being implemented and/or interpreted by state and local parties is baseless and without merit or factual support. I encourage the current regulation be retained.

Thank you for this opportunity to submit these comments.