



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 14, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1980-23

Mr. Marion Edwyn Harrison
Barnett, Alagia & Carey
1627 K Street, N.W.
Washington, D.C. 20006

Dear Mr. Harrison:

This responds to your letter of March 7, 1980, requesting an advisory opinion on behalf of the Agricultural and Dairy Educational Political Trust ("ADEPT") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the official name of ADEPT.

ADEPT is the separate segregated fund of Mid-America Dairymen, Inc. You state that, except in formal writings, Mid-America Dairymen, Inc. is ordinarily abbreviated as "Mid-Am." In order to comply with the Act, you ask whether ADEPT's present name may be prefixed by either the words (1) "Mid-Am" or (2) "Mid-America" or (3) "Mid-Am Dairymen" or (4) "Mid-America Dairymen" rather than "Mid-America Dairymen, Inc."¹

The Federal Election Campaign Act Amendments of 1979² amended 2 U.S.C. 432 to provide that the name of any separate segregated fund must include the name of its connected organization. 2 U.S.C. 432(e)(5). However, this provision does not prohibit the use of abbreviations or acronyms as long as the official name of the committee (separate segregated fund) is used in all disclosure statements required by 2 U.S.C. 441d. See H.R. Rep. No. 422, 96th Cong., 1st Sess. 13 (1979). Recently prescribed Commission regulations provide that an abbreviation or acronym, if used by a separate segregated fund, must be "a clearly recognized

¹ You state that these prefixes are named in ADEPT's order of preference. You also note that your purpose is to try to avoid having to spell out the entire corporate name of "Mid-America Dairymen, Inc." while at the same time retaining the name "ADEPT", with which farmers and political candidates have become familiar over the past ten years.

² P.L. 96-187, effective January 8, 1980.

abbreviation or acronym by which the connected organization is commonly known." 11 CFR 102.14(c), as amended at 45 Fed. Reg. 15108 (March 7, 1980), effective April 1, 1980.

Accordingly, the Commission concludes that ADEPT can use an abbreviation which is clearly recognizable since the purpose of the Act, and the cited regulation, is to afford adequate notice to the public of the identity and sponsorship of separate segregated funds. The Commission further concludes that of the alternative prefixes mentioned in your request those clearly recognizable would be "Mid-Am Dairymen" or "Mid-America Dairymen," but not "Mid-Am" or "Mid-America."

The abbreviated name alone may be used on various documents of ADEPT such as checks and letterheads. See Advisory Opinion 1980-10, copy enclosed. However, ADEPT's official name must be modified to include the full corporate name: Mid-America Dairymen, Inc. An amendment to ADEPT's statement of organization should be filed within 10 days to reflect both the change of official name as well as the abbreviation. 2 U.S.C. 433(c). The official name and abbreviation must both be used on any notices of sponsorship required under 2 U.S.C. 441d and on all reports filed by ADEPT under 2 U.S.C. 434. 11 CFR 102.14(c) at 45 Fed. Reg. 15108 (March 7, 1980).

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. 437f.

Sincerely yours,

(signed)

Robert O. Tiernan
Chairman for the
Federal Election Commission

Enclosure