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 **Southwestern Bell Corporation**

October 22, 1993

Supplement To  
AOR 1993-18

Alan E. Siegel  
Senior Attorney -  
Human Resources

Mr. N. Bradley Litchfield  
Associate General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Litchfield:

This is in regard to our conversation of September 15, 1993. Following are responses to your and Mr. Levin's questions regarding the September 3, 1993 request from Southwestern Bell Corporation ("SBC") for an advisory opinion from the Federal Election Commission ("FEC") pursuant to 2 U.S.C. § 437f with respect to the specific activities set forth therein (copy attached hereto for reference).

Q. On page two, what is the meaning of the words "For example"? Would all three ways that SBC companies propose to facilitate employee and retiree involvement in the campaigns of candidates of their choice be undertaken at each company location? Are there ways of facilitating involvement other than the three ways that are listed?

A. Any of these three involvement options may be used in combination with each other or as stand alone activities at each company location where the program's activities will be undertaken. No other involvement options other than these three would be undertaken.

Q. On page two, in the first bullet paragraph, what is meant by the "etc.?"

A. In this context, "etc." refers to the telephone numbers and addresses of candidates' campaign offices.

Q. On page three, in the first paragraph under Discussion, what is meant by the "etc.?"

A. In this context, "etc." refers to addresses of candidates' campaign offices, what type of volunteer help is needed and when the help is needed.

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Phone 210 351-3431

- Q. On page two, in the second bullet paragraph, what information would be in the information booth described? Would the booth contain campaign materials prepared by candidates or candidates' campaign committees?
- A. The information booth would contain all or some of the following information regarding each candidate running for elective office: name of candidate, party affiliation, office running for, name of contact person at campaign headquarters, telephone number and address for campaign headquarters, what type of volunteer help is needed and when the help is needed. The booth would not contain campaign literature prepared by any candidate or candidate's campaign committee.
- Q. On page two, in the second bullet paragraph, how would employees be "encouraged to contact the campaign headquarters and volunteer to work for the candidate of their choice"?
- A. They would be "encouraged" by company-prepared posters and bulletins and other written means of company communications to employees (flyers, letters, electronic mail) to get involved in the electoral process by volunteering to work in a campaign for a candidate of their choice. No bias or preference would be shown any candidate, in any way.
- Q. Would employees receive time off the job with pay to volunteer in a campaign for a candidate of their choice?
- A. No. SBC companies will not permit employees to take time off the job with pay to work in a campaign. However, employees may use their accrued vacation days and/or designated holidays (which is paid time off and which the employee is free to use as he or she chooses) to work in a campaign.
- Q. Do SBC companies have plans to communicate in a partisan manner with members of the restricted class?
- A. SBC companies have no immediate plans to communicate on a partisan basis with members of the restricted class. However, the possibility exists that it may be decided in the future to communicate in a partisan manner with the SBC's companies' restricted class.
- Q. On page three, in the first paragraph, what is meant by "at no time will the above activities be

used to express advocacy or defeat of a candidate for federal office or for the solicitation of any political contributions"? Will SBC companies undertake any activities designed to influence a federal election?

A. This means that SBC companies will not take any action with regard to encouraging employees to volunteer for campaigns which would have the effect of promoting the campaign of one individual over the campaign of another. Encouraging employees to volunteer will be accomplished in a strictly nonpartisan manner. There will be no express or implied advocacy on the part of the companies. Employees will have complete freedom to choose the campaign of their choice. Employees will be given the information (who to contact, how to contact, when to contact, what type of help is needed) and then employees will be left to choose. The activities of SBC companies will not be designed to influence the course of any federal election one way or another.

Q. What mechanism would SBC companies use to communicate with retirees regarding volunteering to work in a campaign for a candidate of their choice?

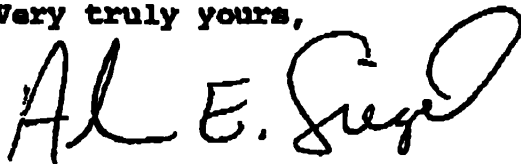
A. SBC companies maintain close ties with retired employees, many of whom are also stockholders of SBC. Retirees often attend company functions. A monthly publication is produced which is designed specifically for retirees. This publication would be used as the vehicle for communicating with retirees on a nonpartisan basis of the needs of campaigns, specifically of the who, how, what, when, where to contact.

Q. On page two, in the first bulleted paragraph, what mechanism would be used for communicating with employees regarding volunteering for a candidate of their choice?

A. This information would be published in company-prepared bulletins, which is the normal means used for communicating local or regional information to SBC company employees, or in another written employee information communications vehicle (poster, flyer, letter, memorandum, electronic mail).

I trust that the foregoing is responsive to your questions. Please contact me if you have any further questions or require any additional information pertaining to this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Al E. Sneyd". The signature is written in a cursive style with a large, looping initial "A" and a distinct "S" at the end.

Attachment