

Collier Shannon Scott

Collier Shannon Scott, PLLC
Washington Harbour, Suite 400
3050 K Street, NW
Washington, DC 20007
202.342.8400 TEL
202.342.8451 FAX

Scott A. Sinder
202.342.8425
ssinder@colliershannon.com

August 30, 2000

Via E-Mail

Jonathan Levin
Attorney
Federal Election Commission
999 E Street, NW
Washington, DC 20436

Supplement to
AOR 2000-22

**Re: Follow-Up Information Related To Request For
An Advisory Opinion On Use Of Electronic Signatures**

Dear Mr. Levin,

On behalf of our clients the Air Transport Association of America, the American Land Title Association, the Council of Insurance Agents and Brokers, the Independent Insurance Agents of America, and the Society of Independent Gasoline Marketers of America (collectively, "Associations"), I am writing as you requested to clarify the manner in which the Associations would like to use electronic signatures in the course of obtaining valid written authorizations to solicit political action committee ("PAC") contributions from restricted class employees. This letter is intended to supplement the Request for an Advisory Opinion that we submitted to the FEC on behalf of the Associations on July 31, 2000.

As noted in that letter, the Associations can and will maintain the necessary security measures to safeguard any electronic signature processes that they institute. There are two separate electronic mechanisms that the Associations would like to use to obtain the requisite authorizations.

First, the Associations would like to receive the requisite authorizations executed with electronic signatures from their member corporate representatives through electronic mail. Each of the Associations maintains a list of the corporate representatives to whom they can directly send electronic mail and they can thus verify a corporate representative's electronic signature by ensuring that the electronic mail to which the executed form is attached was sent from that representative's e-mail address. Two procedural safeguards will reinforce this verification process. First, the Associations intend to provide the requisite forms to their corporate representatives by sending those forms via electronic mail in the first place and they will limit that distribution to their list of member corporate representatives. Second, the Associations

intend to send a confirmation e-mail to each corporate representative upon receipt of a form executed with electronic signatures to further verify the transmission.

Second, each Association would like to make the corporate authorization forms available to their member corporate representatives on the secured, "member-only" portions of their internet websites. The Associations can ensure that only the corporate representatives have access to these forms through the use of coded private passwords that would limit access to the corporate representatives. The corporate representatives would then be permitted to provide written authorization through the website via an electronic signature. Following receipt of a form executed with an electronic signature through the website, the Associations would send a notification to the representative to confirm receipt of the form as it would following receipt of a form attached to an e-mail.

I hope that this is helpful. Please let me know if I can answer additional questions or provide further clarification.

Sincerely,

Scott A. Sinder