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August 18, 2003

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

*Comment to
AOR 2003-22*

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

RE: AOR 2003-22

Dear Mr. Norton:

I write on behalf of the Nebraska Bankers Association (NBA) in support of Advisory Opinion Request 2003-22. The NBA is a trade association representing 268 of the 270 commercial banks and eight savings and loans in the state of Nebraska.

It is our understanding that the American Bankers Association has submitted this Advisory Opinion Request seeking clarification regarding the ability of executives of member corporations to collect and forward contributions for trade association PACs. We would encourage the Federal Election Commission (FEC) in responding to this Advisory Opinion Request to confirm that executives of corporate members are permitted to collect and forward contributions for trade association PACs.

We believe that the effect of the conciliation agreements referenced in the Advisory Opinion Request has resulted in an overly restrictive limitation on the ability of member corporations to solicit and facilitate contributions on behalf of their trade association's PAC. Subject to the limitations described by the ABA in its Advisory Opinion Request and as further clarified by the ultimate advisory opinion to be issued by the FEC, we would encourage the FEC to rule affirmatively in clarifying the ability of member corporations to solicit and facilitate contributions on behalf of their trade association's PAC.

Sincerely,

George Beattie
President
george.beattie@nebankers.org

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