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Draft AO 2007-27: Regarding ActBlue's desire to solicit contributions for restricted SSFs, we urge the Commission to adopt Draft A, the more permissive version. Under Program 1, grassroots donors should be able to contribute to PACs whose objectives they support, and allowing ActBlue to serve as a conduit for such contributions does not implicate any of the policy concerns underlying the restrictions regarding SSFs. The same source prohibitions and contribution amount limitations will be enforced, and no SSF funds will be expended outside the class.

There is no reason to prevent grassroots donors from contributing to PACs whose objectives they endorse. Based on our experience with the netroots community, we are confident that grassroots donors would use ActBlue's Program 1 to support such groups, and that doing so serves the best interests of a healthy political process.

Over the past few years, this Commission has shown tremendous sensitivity to the ways in which technology has transformed the terrain for campaign finance regulation, and has consistently taken an approach which encourages innovative efforts to encourage grassroots political activity through the Internet. For those efforts to continue, we urge the Commission to reject Draft Opinion 2007-31 and approve Draft A for Opinion 2007-27.

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