From:	Oakland
To:	mdove@fec.gov
Subject:	Act Blue: Approve Draft A for Opinion 2007-27 & Reject Draft Opinion 2007-31.
Date:	12/13/2007 10:57 AM

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, **I urge the Commission to reject Draft Opinion 2007-31 and approve Draft A for Opinion 2007-27.**

ActBlue is a conduit for individual contributor preferences, to track and aggregate small-dollar contributors. It asserts no control over the recipients of its funds; the site's only criteria is that the recipient be a Democrat. It fulfills FECA's anticorruption goals by reporting contributors' names, addresses, employers, and occupations to campaign, which in turn provide that information to the Commission as is legally required.

There is no conceivable purpose for campaign finance law that would be served by treating the ActBlue contributions as not-matchable under the law, as ActBlue presents none of the concerns articulated by the groups otherwise covered by 11 CFR 9034.3(f), and for these purposes is more akin to a credit card processor than any other entity. This is technology being used to encourage small-dollar contributions which are at the heart of reforming our campaign system, and to treat it as "dirty money" seems ludicrous. Nothing distinguishes these from any other small-dollar contributions other than the website through which they were sent. The Commission should reject the draft opinion and allow the Edwards campaign to seek matching funds for contributions transmitted by ActBlue.

Of all the campaigns, Edwards is the only one accepting public money and refusing money from PACs. For you to further
undermine his efforts to run a "clean campaign" would be counter to the goals you attempt to meet.