From:	Sandra Dockendorff
To:	feccomment@johnedwards.com
Subject:	FEC Comment
Date:	12/12/2007 03:27 PM

FEC Comment Submission (johnedwards.com)

Sandra Dockendorff

Danville, IA 52623

Comment: Please reject Draft Advisory Opinion 2007-31.

I believe that individual credit/debit card contributions made online through ActBlue should be eligible to be matched under the Matching Fund Act.

I believe these donations meet both the letter and the spirit of the Matching Fund Act. ActBlue is not a Connected Party Committee, nor is it an illegal entity. They do not direct the activities of any candidate or Party. The contributions are made TO a specific candidate BY individuals and all identifying information is collected FROM individuals exactly as if they were contributing through a candidate's website or writing a check or money order and mailing it to the campaign headquarters. Since the latter two methods meet the requirements, I do not see how contributions made through ActBlue are any different.

In multiple previous Advisory Opinions, the Commission notes that as ActBlue is an Unconnected Party Committee that does not exercise direction or control over the choice of the recipient candidate that those contributions are just the same as if the contributions were received directly from an individual. This is the case here. ActBlue did not direct where those contributions went, each individual making those contributions clearly made that choice for themselves. Furthermore, the way that the website is set up, contributors clearly believe they are making contributions directly TO the candidate of their choice. This is obviously different from contributions made to a defined Union or Corporate political action committee account where the individuals cede their choice to whomever the organization chooses.

I fully support public financing of presidential candidates. I further believe that this draft advisory opinion needlessly raises barriers for presidential campaigns to participate. At a minimum, the FEC ruling should exempt those contributions already made to a candidate through a mechanism that has been viewed by contributors as legal and clearly similar to other methods not in contention. A contributor would have had no way of knowing that their contributions would not meet the requirements for matching funds as stated by an Advisory Opinion that has not yet been finalized.

Thank you.