

Comment on AOR 2012-17

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OFFICE OF GENERAL
COUNSEL

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Communications Workers of America (CWA) ● Democracy Matters ● Demos

Public Citizen ● Rootstrikers ● United Republic ● U.S. PIRG

Federal Election Commission
999 E St. NW
Washington, DC 20463

RE: Comment on Advisory Opinion Request 2012-17

April 30, 2012

Dear General Counsel:

We write in support of Advisory Opinion Request (AOR) 2012-17 (<http://saos.nictusa.com/aodocs/1206315.pdf>) dated April 5, 2012, and submitted by Arent Fox on behalf of Red Blue T LLC and ArmourMedia, Inc. We hope you will approve an opinion that is consistent with the outcome urged by the requestors. Doing so will provide enhanced opportunities for millions of Americans to participate in the political process by texting a campaign contribution to a political candidate.

As we simultaneously work to reduce the role of unchecked Super PACs and corporate special interest spending, we must also support small donors, who continue to have a diminished role in the political process. In the 2010 elections, Senate candidates received only about 11.5% of their total funding from donors contributing less than \$200, and House candidates on average received no more than 9% of total campaign money from small donors. The 2012 election seems to continue a similar trend. Of the approximately 235 million Americans age 18 and over, fewer than 0.2% made a campaign contribution totaling \$200 or more to a federal candidate through the end of 2011, according to data from the Center for Responsive Politics.

Small donors are a critical component of our democratic process, and technology can play a crucial role in helping to empower the voices of more Americans. More than 30 million Americans have texted a contribution to a charitable cause, and many people would likely text a donation to a political candidate if the practice is enabled.

Allowing text message campaign contributions has many benefits. In addition to amplifying the voices of small donors, it can increase civic engagement by bringing more people into the political process and enable Members of Congress to spend more time with constituents and less time dialing for dollars. Enacting this practice, which several local and state jurisdictions have begun to implement, would cost the government nothing.

We encourage you to reach an outcome consistent with the requestors' AOR, and we thank you for considering our views.

Sincerely,

**Aaron Scherb
Legislative Program Manager
Public Campaign**

**Paul S. Ryan
Senior Counsel
Campaign Legal Center**

**Melanie Sloan
Executive Director
CREW**

**George Kohl
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Founder
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**Nick Penniman
President
United Republic**

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