




FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission
Staff Director
General Counsel
Press Office
Public Disclosure

FROM: Commission Secretary 

DATE: June 5, 2012

SUBJECT: Comments on Draft AO 2012-17
(Red Blue T LLC, Armour Media, Inc.,
and m-Qube, Inc.)

Transmitted herewith is a late submitted comment from Aaron Scherb on behalf of Public Campaign, Campaign Legal Center, Citizens for Responsibility and Ethics in Washington (CREW), Communication Workers of America (CWA), Democracy Matters, Demos, Public Citizen, Rootstrikers, United Republic, and U.S. PIRG.

Draft Advisory Opinion 2012-17 is on the June 7, 2012 open meeting agenda.

Attachment



Aaron Scherb
<ascherb@campaignmoney.org>

06/05/2012 10:43 AM

To "pubrec@fec.gov" <pubrec@fec.gov>,
cc
bcc

Subject Comment on Draft B for AO 2012-17

History:  This message has been forwarded.

1 attachment



06.05.12 Final letter to FEC in support of Draft B for AO 2012-17.pdf

To Whom It May Concern:

Attached are comments from ten organizations in support of Draft B for AO 2012-17. Thank you for your consideration.

Best,
Aaron

--

Aaron Scherb, Legislative Program Manager
Public Campaign
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Washington, DC 20036
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Office: (202) 736-5726/

On 4/30/12 2:51 PM, "Aaron Scherb" <ascherb@campaignmoney.org> wrote:

To Whom It May Concern:

Attached are comments from ten organizations on AOR 2012-17. Thank you again for granting us the extension until May 1 to submit these.

Best,
Aaron

**Public Campaign ● Campaign Legal Center
Citizens for Responsibility and Ethics in Washington (CREW)
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 2012-17, Draft B

June 5, 2012

Dear General Counsel:

We write in support of Advisory Opinion (AO) 2012-17 Draft B (Agenda Document No. 12-39) dated May 23, 2012, issued in response to a request submitted by Arent Fox on behalf of Red Blue T LLC and ArmourMedia, Inc. We encourage the Commission to approve Draft B. 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 adopt Draft B for AO 2012-17, 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
Senior Director
Communications Workers of America**

**Joan Mandle
Executive Director
Democracy Matters**

**Adam Lioz
Counsel, Democracy Program
Demos**

**Craig Holman
Government Affairs Lobbyist
Public Citizen**

**Lawrence Lessig
Founder
Rootstrikers**

**Nick Penniman
President
United Republic**

**Blair Bowie
Democracy Advocate
U.S. PIRG**