



Charles Spies - Legal <CSpies@rncHQ.org> on 09/22/2003 06:25:35 PM

To: multicand03@fec.gov  
cc:

Subject: RNC Comment

Attached please find the RNC's comment on the Multicandidate Committee Rulemaking. Thank you in advance for the Commission's indulgence in accepting it a business day late due to the weather situation in DC at the end of last week.

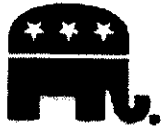
- Charlie

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Republican  
National  
Committee

**Counsel's Office**

September 22, 2003

Ms. Mai T. Dinh  
Acting Assistant General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**VIA E-MAIL: [multicand03@fec.gov](mailto:multicand03@fec.gov)**

Dear Ms. Dinh:

These comments on the Federal Election Commission's ("the Commission") Proposed Rules relating to Multicandidate Committees and Biennial Contribution Limits, 68 Fed. Reg. 50488 ("Proposed Rules" or "Rulemaking") are submitted on behalf of the Republican National Committee ("RNC"). The RNC thanks the Commission for the opportunity to comment in writing on these Proposed Rules, and please note that the failure of the RNC to answer any specific question asked by the Commission in the Rulemaking should not be interpreted as having any implication on the merits of the question.

The RNC wishes to emphasize just one point regarding this Rulemaking, specifically on 11 CFR 110.5, Aggregate Biennial Contribution Limitation for Individuals. While we take no position on the substance of the proposed change to attribute a contribution to a candidate to the two-year period in which the contribution is actually made, procedurally it is imperative that any change to the current Regulations (attributing such contributions to the two-year period of the actual election) be implemented with an effective date of January 1, 2005. A substantial number of contributors have already made contributions in reliance on the Commission's previously stated position that such contributions would not count against their 2003-2004 aggregate candidate contributions limit. To change this policy mid-election cycle would be unfair and substantially burden contributors that in good faith relied on Commission guidance.

The RNC thanks the Commission for your consideration of this important issue.

Respectfully Submitted,

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