



Sharon Miller <Sharon@rencenter.org> on 04/02/2004 06:13:59 PM

To: "politicalcommitteestatus@fec.gov" <politicalcommitteestatus@fec.gov>
cc:

Subject:

<<FEC letter.doc>>
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April 2, 2004

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

Re: Comments and Request to Testify Concerning Notice of Proposed Rulemaking on Political Committee Status.

Dear Ms. Dinh:

As a concerned citizen and board member of the American Jewish World Service, I submit these comments to oppose the Notice of Proposed Rulemaking on Political Committee Status issued by the Federal Election Commission on March 11, 2004 (hereinafter "NPRM").

The rulemaking proposal under consideration by the FEC threatens to seriously impede our ability as a 501 (c) 3 organization to engage in public policy debate. I am particularly concerned about the proposal to expand the definition of "expenditure" to include communications that "promote, support, oppose or attack" a federal candidate or a policy position of a candidate. In addition, the proposed rule which would convert many nonprofits into "political committees" if they spend \$50,000 or 50% of total disbursements in the current year or any of the past four years on these kinds of communications or voter mobilization is very troubling.

As a 501 (c) 3, American Jewish World Service already carefully abides by Internal Revenue Service guidelines regarding elections and candidates. Prohibiting us from speaking out on any policies or legislation identified with any public officials who might be running for federal office would make it difficult and, in some cases, impossible for us to express our views. Such a restriction goes far beyond the "Bipartisan Campaign Reform Act of 2002."

I believe that the proposed rule changes would jeopardize the constitutional guarantee of freedom of speech and impact the ability of American Jewish World Service to carry out the public policy work that is an important part of our mission.

Sincerely,

Sharon Miller