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OFFICE OF THE
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Ms Mai T Dinh. Acting Assistant General Counsel.

Subject: Opposition to Rule Proposed.

I am opposed to the proposed changes to 11 CFR parts 100, 102, 106 and 114 published in the Federal Register March 11 2004 in their entirety. These proposed changes are inconsistent with the letter and intent of the statute. They exceed the regulatory authority of the Commission since they are substantive and not merely clarifying or making specific statutory intent. Such substantive changes should not be made in the middle of an election but should be left to Congress. The changes would be widely and properly interpreted as a Republican plan to chill free speech and curb the rights of individual Americans to freely associate with like minded Americans in a legally recognized 527 group and to exercise collectively their right to free speech even if it is critical of the President or any incumbent public servant doing the public's business.

There is no justification for classifying 501c groups already regulated by IRS for ~~political~~ political activity who are recognized 527 groups as political parties. Applied with consistency and fairness this would classify many religious organizations, environmental and health advocacy organizations as political parties and open them to challenge in court as illegitimate.

501c organizations. It conflicts with the constitutional protections of free speech, association and religious liberty. I urge that these ill considered and un American rules be withdrawn and most strongly oppose their adoption in any form.

Sincerely,

George Cunningham