



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 28, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1980-86

Connie R. Gale
American Natural Resources Political Action Committee
One Woodward Avenue
Detroit, Michigan 48226

Dear Ms. Gale:

This responds to your letter of July 9, 1980, requesting an advisory opinion on behalf of American Natural Resources, Inc. Political Action Committees ("the Committees") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the continued use of the abbreviation "ANR" on checks and letterheads, of the Committees.

Specifically, you ask if the Committees may continue to use the abbreviation "ANR" on checks and letterheads as the only means of identifying American Natural Resources Inc., the sponsoring organization.

As required by 2 U.S.C. 432(e)(5), the names of separate segregated funds established pursuant to 2 U.S.C. 441b must include the name of the connected organization. This provision does not prohibit the use of abbreviations or acronyms as long as the official name of the committee is used in all disclosure statements, the committee's Statement of Organization, and all disclaimers required by 2 U.S.C. 441d.¹ However, 11 CFR 102.14(c) provides that only a "clearly recognized abbreviation or acronym by which the connected organization is commonly known" may be used by a separate segregated fund.

The Commission has previously issued two advisory opinions which address the question you raise. In Advisory Opinion 1980-10 the Commission concluded that the separate segregated "United Telecom" on its checks and letterheads. In restricting the choice of abbreviations of the Agricultural and Dairy Educational Political Trust of Mid-American Dairymen, Inc., to either "Mid-Am Dairymen" or "Mid-American Dairymen", the Commission explained, in Advisory

¹ H.R. Rep. No. 422, 96th Cong. 1st Sess. 13 (1979).

Opinion 1980-23, that the purpose of the Act is "to afford adequate notice to the public of the identity and sponsorship of separate segregated funds."

The abbreviation "ANR" is not a "clearly recognized abbreviation" by which American Natural Resources is commonly known.² "ANR" does not give notice to the public of the connected organization of the political committee in a way comparable to those abbreviations previously approved by the Commission where the most significant part of the corporations' identities were used, i.e. "Telecom" and "Dairymen."

Since the abbreviation "ANR" is not clearly recognized outside the corporation, and does not afford adequate notice to the public of the sponsorship of American Natural Resources, Inc., the Committees may not continue to use it without also providing language which clearly identifies the corporation.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. 437f.

Sincerely yours,

(signed)

Max L. Friedersdorf
Chairman for the
Federal Election Commission

Enclosures (AOs 1980-10, 1980-23)

² Although not "a dispositive criterion, the abbreviation "ANR" is not used to identify American Natural Resources on either stock exchange or in 1 Standard and Poor's Register 1980.