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12/04/2006 04:31 PM

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To <purposedisburse@fec.gov>

cc "Sheila Krumholz" <skrumholz@crp.org>

bcc

Subject Comments from the Center for Responsive Politics

Ms. Rothstein,

I am submitting the following comments from the Center for Responsive Politics on behalf of Acting Executive Director Sheila Krumholz. A paper copy of these comments will be sent to the Commission by mail.

Massie Ritsch

Communications Director

Center for Responsive Politics

(202) 354-0111

December 4, 2006

Ms. Amy Rothstein

Acting Assistant General Counsel

Federal Election Commission

999 E Street, N.W.

Washington, DC 20463

RE: Comments of the Center for Responsive Politics on: Request for Comment: "Purpose of Disbursement" Entries for Filings with the Commission

Dear Ms. Rothstein:

The Center for Responsive Politics greatly appreciates the Commission's interest in more complete and specific disclosure of campaign and political committee expenditures. As a nonpartisan research group studying campaign finance and the larger role of money in elections and public policymaking, the Center fully supports the Commission's goal of making the purposes of spending more clear for the public's benefit, and we gratefully offer these brief comments on the proposed Commission guidance. In addition, we fully endorse the comments previously submitted by the Campaign Finance Institute, which takes a similar interest in greater disclosure of political spending.

For more than two decades the Center for Responsive Politics has been "following the money" in federal politics. Historically, that trail has been easiest to follow as the money comes in, but increasingly there is public, scholarly and journalistic interest in how the money is spent. The Commission's proposed guidance will help clear that trail.

Analyzing as we do hundreds of thousands of expenditure records each election cycle, we see the multitude of ways that committees describe their expenditures. To too great a degree the expense is in the eye of the spender. One committee's "fundraising expenses" is another's "flowers." Amending the current system to place disbursements within a limited set of inclusive categories would be most helpful. It would place little additional burden on the regulated community, and in exchange, the community would have the reassurance that its filings would not be unnecessarily questioned by the Commission or others.

For these reasons primarily, the Center hopes that the Commission will implement such a purpose-specific system for disbursement filings and require corrections of those who do not adhere to it. We are happy to comment further based on our research and experience, if the Commission would like.

Sincerely,

Sheila Krumholz

Acting Executive Director

Center for Responsive Politics

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