






*general public political advertising.*” 11 C.F.R. § 100.26 (emphasis added). “Telephone bank” is defined as “more than 500 telephone calls of an identical or substantially similar nature within any 30-day period.” 11 C.F.R. § 100.28. It surely cannot be the case that 75 telephone calls, like those in this matter, fall outside the regulatory definition of “public communication” as a “telephone bank” but are nonetheless a public communication under the catch-all “general public political advertising.” Common sense and basic legal canons of construction suggest otherwise.

  
\_\_\_\_\_  
Sean J. Cooksey  
Vice Chairman

5/31/2023  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Allen J. Dickerson  
Commissioner

5/31/2023  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
James E. “Trey” Trainor, III  
Commissioner

5/31/2023  
\_\_\_\_\_  
Date