



July 27, 2009

VIA E-MAIL

Mr. Robert Hickey
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Comments on Web Site and Internet Communications Improvement Initiative

Dear Mr. Hickey:

I have been working in the area of political campaign accounting, compliance, and financial oversight for close to twenty years. Currently, I am President of Political C.F.O.s., Inc., a small compliance and financial oversight firm in Alexandria, VA.

When I started my career in the field of compliance and accounting for political campaigns, the internet was in its infancy, and most individuals had not even heard of it. Since that time, there have been monumental changes in the way we all communicate with each other, and the internet is probably the most significant factor attributable to that change. The Federal Election Commission has not been immune to those changes, and I commend the Commission for the way it has embraced the internet as a platform to improve on the process in which the public gains access to the information the FEC holds.

Let's not forget the days of paper filing of reports (the U.S. Senate notwithstanding), or the days where information was accessed through regular mail, 1-800 numbers, and trips to the FEC's offices in Washington, DC.

Through the work we do at Political C.F.O.s., Inc. for our clients, we view the subject at hand from a very unique perspective. We service multiple clients, at many levels, and from many parts of the country. We interact with the FEC on many levels, through the Reports Analysis Division, through Office of the General Counsel, through the Audit Division, and through the periodic trainings conducted by the FEC. However, we most often will utilize the FEC's website for obtaining information relating to our business and the work we are conducting on behalf of our clients, before contacting FEC personnel directly.

We view the FEC's website as fabulous resource for obtaining information. However, since the Commission is seeking comment on the subject, there are a few points worth considering, in your effort to improve the way the FEC communicates through the internet. Although these are only a few of the changes we would like to see, they are the most significant for the purposes of what we do on a regular basis at Political C.F.O.s.

First, and this has been mentioned in some of the other individual suggestions, it seems as though the primary focus on searchable data has been on the side of contributions. It would be helpful if individuals could search the database of disbursements as well.

Second, it would be very helpful if there were a greater degree of flexibility in a user's search criteria. Let's face it, each user wants information for different reasons, and in different ways. A newspaper reporter will be looking for different items than we will at Political C.F.O.s., and will want to see it presented in different ways.

Third, the website has two different ways to search for reports that have been filed. One way is to view images of the reports in Adobe format. The reports are grouped by reporting period. Even the letters requesting additional information (RFAI's) are listed alongside the reports they reference. In another area, the reports can be downloaded in their raw data format, and viewed on a local server or computer through the FEC Print function. However, trying to discern where the report is located that you want to download can be a bit time consuming and confusing. All of the reports are listed in chronological order. You may find an amendment for a reporting period of a year or two ago listed right below a report for the latest reporting period. Additionally, there may be three or four amendments for a single report that have been filed by a committee. However, they are generally not listed together, so it can be difficult to determine how many amendments have actually been filed. It would be helpful if an individual could sort the list of reports by either, date, reporting period, etc.

I would suggest combining the two areas in which an individual can search for reports, and give them an option as to the way in which they are listed, as well as the format in which they would like to view/download the information.

Finally, although this suggestion doesn't directly relate to improving the functions of the Commission's website, I would suggest the Commission spend a fairly significant amount of time making improvements to the current FEC.file software. FEC.file will never replace the software packages offered by independent vendors such as NGP, Aristotle, Complete Campaigns, Patton Technologies, etc. All of these systems, as well as others, provide a lot of extra *bells and whistles* users may be looking for, that realistically, the FEC should not be concerning itself with. However, smaller campaigns, with significantly less in financial resources, may be better served using a free system, like FEC.file. Political C.F.O.s. often provides compliance services for clients utilizing using FEC.file and we have experienced situations where FEC.file seriously hampers our ability to adequately provide compliance services to our clients, which brings me to my final suggestion.

From a practitioner's perspective, FEC.file is very difficult to use during the report reconciliation process of our work. FEC.file does not allow a user to effectively produce reports that can be used to crosscheck for accuracy, the data between what is in one's

accounting system, and what is in FEC.file. Most vendors have an option in their software that allows the user to view or print out simple reports that list either contributions or disbursements in a format that allows for easy reconciliation. Additionally, FEC.file does not currently allow a state party committee to effectively produce reports on allocable disbursements without printing the Schedule H4's as part of a printed FEC Report. A transaction report lists only the shared amounts, not the gross disbursement amounts.

There are other suggestions I could provide on this subject, but these are a few of the ones that would most affect our ability to obtain, view, or extract data from the FEC's website that would be most useful to us.

I have read many of the comments already posted on the FEC's website regarding the upcoming hearing. There are numerous, very good suggestions, that I am sure will be incorporated in the changes the Commission makes in the future as a result of this forum. Let's not forget how cumbersome even this process of commenting would have been even 15 years ago. In order for me to read the comments already made by others, I likely would have had to obtain them by physically go to the Commission's offices to get them, and have them printed out on paper, only to take them home to read, ultimately disposing of them in the trash when finished.

We've come a long way, and I commend the Commission on its efforts to continually seek to improvements in the way information is disseminated to the public, lawyers, programmers, and practitioners like myself.

I would invite the opportunity to speak to these and other topics during the Commission's upcoming public hearing on July 29th.

Sincerely,

Paul W. Houghtaling, President
Political C.F.O.s., Inc.