



90 AUG 22 AM 8: 42

Republican National Committee

Committee

Benjamin L. Ginsberg Chief Counsel

chael A. Hess

Michael A. Hess Janice P. Lacy Deputy Chief Counsels

> Ms. Lee Ann Elliott Chairman Federal Election Commission 999 E Street, N.W. Washington, DC 20463

Late Comment ₹
AOR 1990 -14 €

RE: Advisory Opinion Request 1990-14

Dear Chairman Elliott:

The Commission is considering an advisory opinion request regarding the use of 900 telephone service for political fundraising. While we offer no specific comment on the request now before the Commission, we encourage the Commission to establish practicable guidelines for the use of this service by political committees.

We believe use of the 900 service by political committees has the potential to foster greater public participation in the financial support of political campaigns. Accordingly, we urge the Commission to formulate guidelines which will adequately address the compliance issues raised by the implementation and use of the service, and yet will preserve the effectiveness of the service for political committees.

In conclusion, we believe the 900 service will not achieve its full potential unless the Commission crafts guidelines that allow the service's full potential to be utilized while insuring that political committees are within all relevant statutes and regulations.

Thank you for your consideration.

Marin II. Ginsberg