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NEIL P. REIFF

January 5, 2000

Via Facsimile

Michael Marinelli, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: AOR 1999-36

Supplement to
AOR 1999-36

Dear Mr. Marinelli:

This will respond to the questions you raised on the telephone with us concerning the above-referenced Advisory Opinion Request submitted on behalf of our client, Campaign Advantage, and will clarify certain factual portions of our submission.

First, in the case of all contributions made through the Campaign Advantage system of donor securely entered data, after the donor clicks "submit contribution," and before the contribution is processed, the Internet payments processing company, oMoney.NET, automatically performs four screening functions on the donor information:

- (1) The ABA transit number is checked with a check-sum algorithm for validity;
- (2) The checking account number is put through a filter to determine only if there is any identifiable problem with the number itself (but note that the account number is not checked against any other information about the checking account, such as the name or address of the account holder);
- (3) The check number is put through a filter to determine if it appears to be in proper sequence; and
- (4) The donor's phone number is checked to ensure it is consistent with the donor's zip code.

Second, the optional additional screening process described in paragraph 9 of our submission, the check verification system, is actually a match against a database of information supplied by participating merchants about checking accounts with which

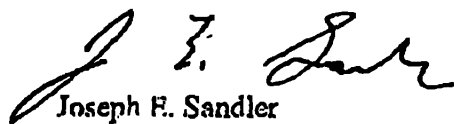
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they have experienced some problem, such as a bounced check or closed account. If no information has been reported by a participating merchant about a particular checking account, this verification system will not verify any further information about the donor or his or her account. If any merchant has reported any information about the donor that includes the donor's driver's license number or social security number, that information will be called up based on the driver's license or social security number provided by the donor on the Campaign Advantage form, but may not be reported back if such reporting is barred by the Fair Credit Reporting Act and/or Fair Debt Collection Act.

Thus, this optional screening process does not provide any universal means of verifying donor information against a database of checking account information provided by banks. Indeed, it is our understanding that no such universal screening process exists. In other words, when a paper check is provided to a merchant, in person, there is no system in existence that will allow the merchant, in real time, to verify that the address on the check or provided by the customer matches the address on file with the drawee bank for the checking account, unless that customer is flagged by the type of database of information supplied by participating merchants described in the preceding paragraph.

If you need any further information in connection with this AOR, please let us know.

Sincerely yours,



Joseph F. Sandler
Neil P. Reiff
Counsel for Campaign Advantage