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Regina Mullen, Director

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October 8, 2003

Lawrence Norton, Esq.
General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

**Re: WE LEAD Women Engaged in Leadership, Education, and Action in Democracy
Committee ID: C00388561
AOR 2003-23**

Dear General Counsel Norton:

I serve as Director of African Americans for Democratic Leadership (AADL), a new organization which intends to register as an "unconnected political action committee." A ruling on the above-captioned matter is of direct consequence to small national-outreach organizations, such as ours, which rely upon small donations.

AADL's mission includes the provision of information to citizens throughout the United States. The fact that hundreds of thousands of civilian and military Americans reside abroad means that our local actions will also have global ramifications. In order to reach such a broad audience, it is necessary for us to raise small donations throughout the 2004 Presidential election cycle and beyond. In this way, despite our small size, we can make a positive contribution to issues-based political dialogue.

As recent state and national campaigns make clear, Americans feel comfortable making small donations online in support of candidates and causes in which they believe. Frankly, fundraising is a costly and time-consuming activity, and AADL would rather preserve each donation by using it for research than to spend it on costly fund-raising "dog & pony shows" designed to secure large donations. Pure research, however, is useless unless we can eventually participate in the democratic process by supporting 5 or more candidates as required by the current regulations.

The issue for AADL and other smaller organizations is, therefore, that we need time to research issues and candidates, and make sound recommendations. Rolling donations which can be aggregated allow people to support our mission, and trust that we will do the right thing when it comes time to connect with a candidate and share our findings.

The election season is the time when citizens are motivated to act upon their interests. Yet, some candidates declare much earlier than others, leaving the independent and undecided voter in a quandary: do they support organizations whose mission is to gather information to help them make informed choices, or do they simply hope that the campaigns will get to their issues in time to make meaningful contributions?

Two concerns which we feel can be addressed by the present AOR issues are thus presented:

- 1) Which methods are available for new and growing PACs to raise funds and become effective advocates, if they are not permitted to aggregate funds for future disbursement?
- 2) Does not a policy preventing aggregation effectively prevent small PACs from supporting more than one candidate, as they will not be able to readily secure adequate funding to research candidates who announce late or publish policy positions in a rolling manner?

In writing for African Americans for Democratic Leadership, I urge you to enable the average citizen to support research organizations which assist in the democratic process. We need the flexibility of being able to identify issues and support candidates who appeal to our constituents, without being forced to make early decisions without the benefit of full information.

As implied by Chris Jones of PoliTemps (Comment, dated October 7, 2003): in a bad economy, small donations may be all citizens can afford. By allowing citizens to make small donations, as they can afford to do so, which can then be aggregated, the FEC will contribute to greater civic participation resulting in qualitative improvements in the democratic process. The ability make such small contributions is a direct by-product of internet technology, and should be supported.

In the event that this comment requires a request for extension, I request an extension of time such that this letter may be considered prior to your ruling on the WE LEAD matter. I thank you very much for your time and consideration.

Sincerely,

Regina Mullen
Director

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African Americans for Democratic Leadership (AADL) is a national web-based organization providing sector research, policy papers and other publications with a focus on vision, leadership and implementation of Democratic principles for the benefit of all Americans. The target audience includes African American voters, mainstream media, alternative media and Internet communities.

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