

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - t

July 15, 2013

Kaitlin Eger
Senior Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Identification Number: C00023580

Dear Ms. Eger:

We are writing in response to your June 11, 2013 letter concerning the Committee's amended Statement of Organization filed on May 13, which asks the Committee to "clarify [the] apparent discrepancy" of its registered name not including the full name of its connected organization, "National Association of Letter Carriers of U.S.A."

The Committee's registered name is "Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund)". The Committee formed and, we believe, registered with the Federal Election Commission ("Commission") in 1975, and has used that name ever since. The Committee has filed hundreds of reports with the Commission under that name. In the last eight years alone it has amended its Statement of Organization eight times (in November 2005; September 2006; March, May and July 2009; and May 2013), twice before prompting requests for additional information ("RFAs") (in September 2006 and April 2009) that did not question the Committee's name.

In light of this 38-year history, the Committee believes that it is entitled to retain its name as is, because the Commission has plainly acceded to it. At the very least, the Commission owes the Committee an explanation of the troubling and unexplained "discrepancy" between, on the one hand, the Commission's acceptance of the Committee's name and its repeated declinations to question it "including in RFAs regarding other aspects of amended Statements of Organization" since the beginning year of the Commission itself as well as of the Committee, and, on the other hand, the Commission's sudden and unexplained demand that the Committee explain its naming action 38 years ago. Inasmuch as your letter does not request that the Committee change its name, we will await your response without considering any such action, but we most certainly request that the Commission not ask the Committee to take such a step in light of that history of Commission acquiescence.

Such a request also would be unwarranted because that very long usage "longer than that of most of the many thousands of other committees that have registered with the Commission since 1975" has firmly established the Committee's full name in the public record and public view, and there is absolutely no confusion or lack of awareness that the Committee is the separate segregated fund ("SSF") of the National Association of Letter Carriers of U.S.A. ("Letter Carriers"). To insist on a name change so belatedly, and without any apparent incident of concern prompting it, would serve no public purpose and would be unfair to both the Committee and the Letter Carriers. And, we are not aware of any other instance where the Commission has made such a belated challenge to an SSF's registered name.

Such a request would be pointless for the additional reason that, over the same multi-generational period the Committee has used for many purposes an abbreviated version of its official name that would not change even if the Committee amended its full name as suggested by your letter. "Committee on Letter Carriers Political Education" ("COLCPE") includes the key name "Letter Carriers," which is "a clearly recognized abbreviation or acronym by which the connected organization is commonly known." 11 C.F.R. 102.14(c). This name "give[s] adequate notice to the public of the identity and sponsorship of the SSF," Advisory Opinion ("AO") 2007-15, and includes the "most important" portion of the Letter Carriers' name. See AO 2004-04; AO 1980-86. See also AO 2000-34. And, this abbreviated name is used in conformance with the Commission's naming regulation.

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - Ł

We would note that corporations with multiple subsidiaries and affiliates are accorded especially broad latitude with respect to both the official and abbreviated names of their political committees, see, e.g, AO 2009-14; AO 2004-42; AO 2002-04; AO 1999-20 ? sometimes, it would seem, far beyond what the regulation permits and intends. See, e.g., AO 1982-8 (advising that a committee whose connected organization was the ?International Association of Trade Exchanges? could use ?BARTERPAC? as its ?abbreviated? name). Certainly, the Committee here merits some deference in 2013 to the name it has used without objection from the Commission since 1975.

Sincerely,

Meaghan Slater
Political Director
