



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4418

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN JMW

97043792989

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

LAW OFFICES

MARKOWITZ & RICHMAN

1100 NORTH AMERICAN BUILDING

121 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19107

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TELECOPIER (215) 790-0668

DIRECT DIAL

875-3111

July 15, 1996

RICHARD H. MARKOWITZ *
STEPHEN C. RICHMAN *
PAULA R. MARKOWITZ
QUINTES D. TAGLIOLI
JONATHAN WALTERS **
RUTH SKOGLUND
ANTHONY C. BUSILLO II
ANDREW BRENNER
R. MATTHEW PETTIGREW, JR. *

* ALSO ADMITTED IN NEW YORK
AND DISTRICT OF COLUMBIA
* ALSO ADMITTED IN NEW JERSEY
** ALSO ADMITTED IN DISTRICT OF COLUMBIA

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NEW YORK OFFICE
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(212) 752-6761

HARRISBURG OFFICE
5440 JONESTOWN ROAD
P.O. BOX 6865
HARRISBURG, PA 17112-6865
(717) 541-9475

61-13-0(sub)

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Attn: Office of General Counsel

Gentlemen:

This office is counsel for Communications Workers of America District 13 and Communications Workers of America Local 13100.

This communication constitutes the Union's complaint to the Federal Election Commission about the failure of Bell Atlantic-Delaware to establish a payroll deduction program for political contributions to CWA-COPE for Bell Atlantic-Delaware, Inc., employees represented by Communications Workers of America Local 13100.

Communications Workers of America Local 13100 is the collective bargaining representative of employees of Bell Atlantic-Delaware, Inc. Bell Atlantic-Delaware, Inc., maintains a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by another labor organization. The Union has requested that employees of Bell Atlantic-Delaware, Inc., represented by Communications Workers of America, Local 13100 be permitted to execute payroll authorizations permitting a deduction from wages of a contribution by such employees to CWA-COPE. Bell Atlantic-Delaware, Inc., has not acted upon this request and has failed and refused to comply with the Union's request for such a payroll deduction program for political contributions.

Bell Atlantic Corporation, the parent corporation of Bell Atlantic-Delaware, Inc., uses a payroll deduction plan to collect contributions to political action committees. Such a payroll deduction plan applies to unrepresented employees of Bell Atlantic Corporation and its subsidiaries such as Bell Atlantic-Delaware, Inc., and also applies to other labor organizations representing employees of Bell Atlantic Corporation and its subsidiaries, including Bell Atlantic-Delaware, Inc. Bell Atlantic Corporation and its Bell Atlantic-Delaware, Inc., subsidiary have failed and refused to make such a payroll deduction plan available to Communications Workers of America, Local 13100.

I am enclosing for your information copies of the following documents:

9704379299C

July 15, 1996

Page 2

1. Letter of April 22, 1996, from Communications Workers of America District 13 to a representative of Bell Atlantic Corporation requesting the payroll deduction program for political contribution for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100.

2. Letter dated April 25, 1996, from a representative of Bell Atlantic Corporation to the Assistant to the Vice President of CWA District 13 responding to the communication of April 22, 1996.

On May 7, 1996, the Assistant to the Vice President of CWA District 13 had a telephone conversation with Ms. Helen M. Hanson, who wrote the Company's letter of April 25, 1996. Ms. Hanson advised the Union's representative that there would be no start up costs for the initiation of this payroll deduction program and the Company would advise the Union as to when this program could begin. The Union received no further information from the Company until, on June 26, 1996, Bell Atlantic Corporation's Vice President-Labor Relations, Mr. Tyler Williams, was advised by the Union that the payroll deduction program for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100 had not been initiated and must be initiated within two weeks from the date of such conversation. No such action was initiated by Bell Atlantic Corporation or by its Bell Atlantic-Delaware, Inc., subsidiary.

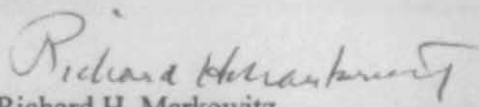
In the almost three months since the Union initially requested Bell Atlantic Corporation and its Bell Atlantic-Delaware, Inc., subsidiary to initiate a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100, no action has been taken and the Company has done absolutely nothing to fulfill its obligation in regard to establishing such a payroll deduction plan. The Union requests that the Federal Election Commission immediately take such action as is necessary and required to insure that Bell Atlantic Corporation and its Bell Atlantic-Delaware, Inc., subsidiary will immediately initiate and make available to employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100 the payroll deduction plan which the corporation is obligated to establish by the Federal Election Campaign Act and by the regulations of the Federal Election Commission.

If you have any questions about the Union's request, please do not hesitate to communicate with the undersigned.

Thanking you in advance for your cooperation, I am

Very truly yours,

MARKOWITZ AND RICHMAN


Richard H. Markowitz

RHM:RAP
Enclosure

97043792991



April 22, 1996

Helen Hanson, Labor Relations
BELL ATLANTIC
One Parkway, 11A
Philadelphia, PA 19102

Dear Helen:

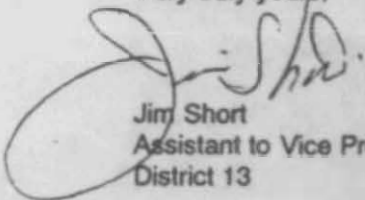
I received a message from Kay Garner of this office on April 17 that you had called regarding the Union's request for a payroll deduction for political contributions for employees of Bell Atlantic-Delaware represented by Local 13100. I was advised that you had spoken to a number of people and were told that a Work Authorization Request would be needed and that the programming department supposedly had a number of priority items and this could not be done for a year or more because other work must be done first.

Please be advised that the regulations of the Federal Election Commission clearly provide that, if requested, a corporation and its subsidiaries must provide a labor organization representing employees working for the corporation with the same method which the corporation uses for soliciting or collecting contributions to a political action committee. This Union has requested, and this communication may be considered as a further request, that employees of Bell Atlantic-Delaware, represented by CWA Local 13100 be permitted to execute payroll authorizations permitting a contribution to the CWA COPE (CWA Political Action Committee).

Your response to my prior oral request for such action by the Company is totally unacceptable. It is my view that your position is in clear violation of the Federal Election Campaign Act and the Regulations issued by the Federal Election Commission.

I would like to be advised immediately of the cost to the Union for the institution of a payroll deduction program for political contributions to CWA COPE (CWA Political Action Committee) for employees represented by CWA Local 13100. Unless I receive such information and unless the Company is prepared to act immediately upon our legitimate request, this Union will have no alternative but to register a complaint with the Federal Election Commission which, as you certainly know, has the power to fine a corporation for failure to comply with its obligations under the statute.

Very truly yours,

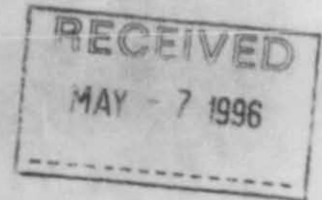

Jim Short
Assistant to Vice President
District 13

JJS/as

cc: V. Maisano, Vice President District 13
R. DeLong, Recording Secretary Local 13100

97043792992

Bell Atlantic - Pennsylvania, Inc.
One Parkway, 11A
Philadelphia, Pennsylvania 19102
Fax 215 563-7028



April 25, 1996

Mr. James J. Short
Assistant to Vice President, District 13
Communications Workers of America, AFL-CIO
230 South Broad Street, 19th Floor
Philadelphia, PA 19102

Dear Mr. Short:

The Company has received the Union's letter dated April 22, 1996 regarding the establishment of a payroll deduction program for political contributions to CWA COPE (CWA Political Action Committee) for Bell Atlantic - Delaware, Inc. employees represented by CWA, Local 13100.

The Company will comply with the Federal Election Campaign Act and Regulations issued by the Federal Election Commission by establishing the payroll deduction program for the CWA COPE.

A determination of costs associated with your request will be prepared and communicated to you as quickly as possible.

Please call me if you have any questions and/or correspondence concerning this request.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. C. Hart".

cc: W. C. Hart
D. Blewett
M. Crompton

c:\13100\copepac.doc

9704379293



FEDERAL ELECTION COMMISSION

Washington, DC 20463

July 19, 1996

Richard H. Markowitz
Markowitz & Richman
1100 North American Building
121 South Broad Street
Philadelphia, PA 19107

Dear Mr. Markowitz:

This is to acknowledge receipt on July 17, 1996, of your letter dated July 15, 1996. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter did not contain a notarization on your signature and was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before him/her also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

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If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,

Retha Dixon by KCS

Retha Dixon
Docket Chief

Enclosure

cc: Bell Atlantic

97043792995

RICHARD H. MARKOWITZ *
STEPHEN C. RICHMAN *
PAULA R. MARKOWITZ
QUINTES D. TAGLIOLI
JONATHAN WALTERS **
RUTH SKOGLUND
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* ALSO ADMITTED IN NEW YORK
AND DISTRICT OF COLUMBIA
* ALSO ADMITTED IN NEW JERSEY
** ALSO ADMITTED IN DISTRICT OF COLUMBIA

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF
COUNSEL
JUL 26 3 03 PM '96
LAW OFFICES
MARKOWITZ & RICHMAN
1100 NORTH AMERICAN BUILDING
121 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19107

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875-3111

July 23, 1996

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512 HAMILTON STREET
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5440 JONESTOWN ROAD
P.O. BOX 6865
HARRISBURG, PA 17112-6865
(717) 541-9475

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Attn: Retha Dixon, Docket Chief

mur 4418

61-13-0(sub)

Dear Ms. Dixon:

Enclosed please find a notarized complaint on behalf of our client Communications Workers of America District 13 and Communications Workers of America Local 13100 against Bell Atlantic Corporation and Bell Atlantic-Delaware, Inc.

The enclosed is being sent to you in response to your letter to me of July 19, 1996, in which you advised that this matter would remain confidential for a 15 day period to allow me to correct the defects in the original complaint filed with you by letter of July 17, 1996.

Thanking you in advance for your cooperation, I am

Very truly yours,

MARKOWITZ AND RICHMAN

Richard H. Markowitz
Richard H. Markowitz

RHM:RAP
Enclosure

97043792996

BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JUL 26 3 03 PM '96

COMMUNICATIONS WORKERS OF AMERICA :
DISTRICT 13 and :
COMMUNICATIONS WORKERS OF AMERICA :
LOCAL 13100 :
230 South Broad Street :
Philadelphia, PA 19102 :

v. :

BELL ATLANTIC CORPORATION and :
BELL ATLANTIC-DELAWARE :
One Parkway, 11A :
Philadelphia, PA 19102 :

COMPLAINT

Communications Workers of America ("CWA") District 13 and Communications Workers of America ("CWA") Local 13100 file the within complaint against Bell Atlantic Corporation and Bell Atlantic-Delaware because of the failure of Bell Atlantic-Delaware, Inc., to establish a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100.

1. CWA District 13 is a division of Communications Workers of America, a national labor organization.

2. James Short is Assistant to the President of CWA District 13 and makes this complaint on behalf of said District 13 and CWA Local 13100. His office address is 19th Floor, 230 South Broad Street, Philadelphia, Pennsylvania, 19102.

3. CWA Local 13100 is the collective bargaining representative of certain employees of Bell Atlantic-Delaware, Inc., and is a party to a collective bargaining agreement with Bell Atlantic-Delaware, Inc.

4. Bell Atlantic-Delaware, Inc., maintains a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100.

5. CWA District 13 and CWA Local 13100 have requested that employees of Bell Atlantic-Delaware, Inc., represented by the Union, be permitted to execute payroll authorizations permitting a deduction from wages of a contribution by such employees to CWA-COPE. A copy of such request was made by letter dated April 22, 1996, a copy of which is attached hereto and marked Exhibit 1.

6. Bell Atlantic-Delaware, Inc., has not acted upon this request and has failed and refused to comply with the Union's request for such a payroll deduction program for political contributions.

7. In response to the Union's letter of April 22, 1996, marked herein as Exhibit 1, Bell Atlantic-Delaware, Inc., wrote to James Short stating that the Company would comply with the Federal Election Campaign Act and the regulations of the Federal Election Commission by establishing such a payroll deduction program. A copy of such communication of April 25, 1996, is attached hereto and marked Exhibit 2.

8. Bell Atlantic Corporation is the parent corporation of Bell Atlantic-Delaware, Inc.

9. Bell Atlantic Corporation and Bell Atlantic-Delaware, Inc., use a payroll deduction plan to collect contributions to political action committees and such payroll deduction

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plan applies to unrepresented employees of Bell Atlantic Corporation, Bell Atlantic-Delaware, Inc., and also applies to other labor organizations representing employees of Bell Atlantic Corporation and its subsidiaries, including Bell Atlantic-Delaware, Inc.

10. On May 7, 1996, the undersigned, James Short, had a telephone conversation with Ms. Helen M. Hanson of Bell Atlantic Corporation, who executed Exhibit 2 attached hereto. Ms. Hanson advised Mr. Short that there would be no start up costs for the initiation of this payroll deduction program for employees represented by CWA Local 13100 and the Company would advise the Union as to when this program could begin.

11. On June 26, 1996, the Vice President - Labor Relations of Bell Atlantic Corporation, Mr. Tyler Williams, was advised by James Short that the payroll deduction program for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100 had not been initiated, and no action resulted from such conversation.

12. In the almost three months since the Union initially requested Bell Atlantic Corporation and its Bell Atlantic-Delaware, Inc., subsidiary to initiate a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100, no action has been taken and Bell Atlantic-Delaware, Inc., has done absolutely nothing to fulfill its obligation in regard to establishing such a payroll deduction plan.

WHEREFORE, the undersigned, James Short, Assistant to the President of Communications Workers of America District 13, submits this complaint and requests the Federal Election Commission to take such action as is necessary and required to insure that Bell

Atlantic Corporation and Bell Atlantic-Delaware, Inc., will immediately initiate and make available to employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100 the payroll deduction plan for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100.

Dated:

July 24, 1996

By:

James Short

James Short
Assistant to the President
Communications Workers of America
District 13

19th Floor
230 South Broad Street
Philadelphia, PA 19102
215-546-5574

Sworn to and subscribed
before me this 24th day
of July, 1996.

Linda DiCosta

Notarial Seal
Linda DiCosta, Notary Public
Philadelphia, Philadelphia County
My Commission Expires Jan. 13, 1997
Member, Pennsylvania Association of Notaries



April 22, 1996

Helen Hanson, Labor Relations
BELL ATLANTIC
One Parkway, 11A
Philadelphia, PA 19102

Dear Helen:

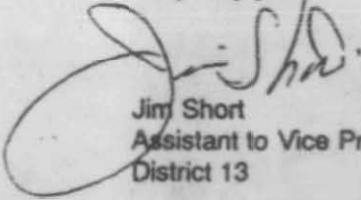
I received a message from Kay Garner of this office on April 17 that you had called regarding the Union's request for a payroll deduction for political contributions for employees of Bell Atlantic-Delaware represented by Local 13100. I was advised that you had spoken to a number of people and were told that a Work Authorization Request would be needed and that the programming department supposedly had a number of priority items and this could not be done for a year or more because other work must be done first.

Please be advised that the regulations of the Federal Election Commission clearly provide that, if requested, a corporation and its subsidiaries must provide a labor organization representing employees working for the corporation with the same method which the corporation uses for soliciting or collecting contributions to a political action committee. This Union has requested, and this communication may be considered as a further request, that employees of Bell Atlantic-Delaware, represented by CWA Local 13100 be permitted to execute payroll authorizations permitting a contribution to the CWA COPE (CWA Political Action Committee).

Your response to my prior oral request for such action by the Company is totally unacceptable. It is my view that your position is in clear violation of the Federal Election Campaign Act and the Regulations issued by the Federal Election Commission.

I would like to be advised immediately of the cost to the Union for the institution of a payroll deduction program for political contributions to CWA COPE (CWA Political Action Committee) for employees represented by CWA Local 13100. Unless I receive such information and unless the Company is prepared to act immediately upon our legitimate request, this Union will have no alternative but to register a complaint with the Federal Election Commission which, as you certainly know, has the power to fine a corporation for failure to comply with its obligations under the statute.

Very truly yours,


Jim Short
Assistant to Vice President
District 13

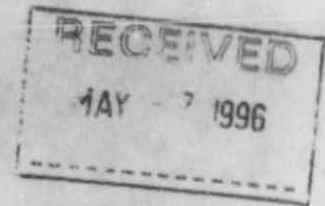
JJS/as

cc: V. Maisano, Vice President District 13
R. DeLong, Recording Secretary Local 13100

Exhibit 1

97043793001

Bell Atlantic - Pennsylvania, Inc.
One Parkway, 11A
Philadelphia, Pennsylvania 19102
Fax 215 563-7028



April 25, 1996

Mr. James J. Short
Assistant to Vice President, District 13
Communications Workers of America, AFL-CIO
230 South Broad Street, 19th Floor
Philadelphia, PA 19102

Dear Mr. Short:

The Company has received the Union's letter dated April 22, 1996 regarding the establishment of a payroll deduction program for political contributions to CWA COPE (CWA Political Action Committee) for Bell Atlantic - Delaware, Inc. employees represented by CWA, Local 13100.

The Company will comply with the Federal Election Campaign Act and Regulations issued by the Federal Election Commission by establishing the payroll deduction program for the CWA COPE.

A determination of costs associated with your request will be prepared and communicated to you as quickly as possible.

Please call me if you have any questions and/or correspondence concerning this request.

Very truly yours,

W. C. Hart

cc: W. C. Hart
D. Blewett
M. Crompton

c:\13100\copepac.doc

Exhibit 2

97043793002

LAW OFFICES
MARKOWITZ & RICHMAN
1100 NORTH AMERICAN BUILDING
121 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19107

RICHARD H. MARKOWITZ *
STEPHEN C. RICHMAN *
PAULA R. MARKOWITZ
QUINTES D. TAGLIOLI
JONATHAN WALTERS **
RUTH SKOGLUND
ANTHONY C. BUSILLO II
ANDREW BRENNER
R. MATTHEW PETTIGREW, JR. *

* ALSO ADMITTED IN NEW YORK
AND DISTRICT OF COLUMBIA
* ALSO ADMITTED IN NEW JERSEY
** ALSO ADMITTED IN DISTRICT OF COLUMBIA

(215) 875-3100
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July 25, 1996

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(717) 541-9475

61-13-1421

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Attn: Retha Dixon, Docket Chief

MUR 4418

Dear Ms. Dixon:

Enclosed please find an amended complaint on behalf of our client Communications Workers of America District 13 and Communications Workers of America Local 13100 against Bell Atlantic Corporation and Bell Atlantic-Delaware, Inc.

The following changes have been made:

1. Page 1, Paragraph 2, Line 1:
James Short is Assistant to the Vice President of CWA District 13 ...
2. Page 2, Paragraph 4, Line 3:
CWA Local 13101.

Thanking you in advance for your cooperation, I am

Very truly yours,

MARKOWITZ AND RICHMAN

Richard H. Markowitz
Richard H. Markowitz

RHM:RAP
Enclosure

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 29 9 42 AM '96

97043793003

BEFORE THE
FEDERAL ELECTION COMMISSION

COMMUNICATIONS WORKERS OF AMERICA :
DISTRICT 13 and :
COMMUNICATIONS WORKERS OF AMERICA :
LOCAL 13100 :
230 South Broad Street :
Philadelphia, PA 19102 :

v. :

BELL ATLANTIC CORPORATION and :
BELL ATLANTIC-DELAWARE :
One Parkway, 11A :
Philadelphia, PA 19102 :

AMENDED COMPLAINT

Communications Workers of America ("CWA") District 13 and Communications Workers of America ("CWA") Local 13100 file the within complaint against Bell Atlantic Corporation and Bell Atlantic-Delaware because of the failure of Bell Atlantic-Delaware, Inc., to establish a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100.

1. CWA District 13 is a division of Communications Workers of America, a national labor organization.

2. James Short is Assistant to the Vice President of CWA District 13 and makes this complaint on behalf of said District 13 and CWA Local 13100. His office address is 19th Floor, 230 South Broad Street, Philadelphia, Pennsylvania, 19102.

97043793004

3. CWA Local 13100 is the collective bargaining representative of certain employees of Bell Atlantic-Delaware, Inc., and is a party to a collective bargaining agreement with Bell Atlantic-Delaware, Inc.

4. Bell Atlantic-Delaware, Inc., maintains a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13101.

5. CWA District 13 and CWA Local 13100 have requested that employees of Bell Atlantic-Delaware, Inc., represented by the Union, be permitted to execute payroll authorizations permitting a deduction from wages of a contribution by such employees to CWA-COPE. A copy of such request was made by letter dated April 22, 1996, a copy of which is attached hereto and marked Exhibit 1.

6. Bell Atlantic-Delaware, Inc., has not acted upon this request and has failed and refused to comply with the Union's request for such a payroll deduction program for political contributions.

7. In response to the Union's letter of April 22, 1996, marked herein as Exhibit 1, Bell Atlantic-Delaware, Inc., wrote to James Short stating that the Company would comply with the Federal Election Campaign Act and the regulations of the Federal Election Commission by establishing such a payroll deduction program. A copy of such communication of April 25, 1996, is attached hereto and marked Exhibit 2.

8. Bell Atlantic Corporation is the parent corporation of Bell Atlantic-Delaware, Inc.

9. Bell Atlantic Corporation and Bell Atlantic-Delaware, Inc., use a payroll deduction plan to collect contributions to political action committees and such payroll deduction

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plan applies to unrepresented employees of Bell Atlantic Corporation, Bell Atlantic-Delaware, Inc., and also applies to other labor organizations representing employees of Bell Atlantic Corporation and its subsidiaries, including Bell Atlantic-Delaware, Inc.

10. On May 7, 1996, the undersigned, James Short, had a telephone conversation with Ms. Helen M. Hanson of Bell Atlantic Corporation, who executed Exhibit 2 attached hereto. Ms. Hanson advised Mr. Short that there would be no start up costs for the initiation of this payroll deduction program for employees represented by CWA Local 13100 and the Company would advise the Union as to when this program could begin.

11. On June 26, 1996, the Vice President - Labor Relations of Bell Atlantic Corporation, Mr. Tyler Williams, was advised by James Short that the payroll deduction program for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100 had not been initiated, and no action resulted from such conversation.

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Dated:

July 25, 1996

By:

James Short

Assistant to the Vice President
Communications Workers of America
District 13

19th Floor
230 South Broad Street
Philadelphia, PA 19102
215-546-5574

Sworn to and subscribed
before me this 25th day
of July, 1996.

Linda DiCrista

Notarial Seal
Linda DiCrista, Notary Public
Philadelphia, Philadelphia County
My Commission Expires Jan. 13, 1997
Member, Pennsylvania Association of Notaries

Communications
Workers of America
AFL-CIO

200 South Broad Street, 19th Floor
Philadelphia, Pennsylvania 19102
(215) 546-5574 • Fax (215) 985-2102

James J. Short
Assistant to Vice-President
District 13



April 22, 1996

Helen Hanson, Labor Relations
BELL ATLANTIC
One Parkway, 11A
Philadelphia, PA 19102

Dear Helen:

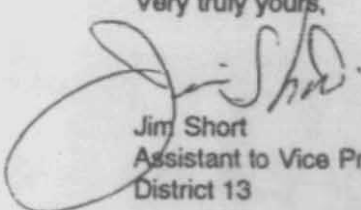
I received a message from Kay Garner of this office on April 17 that you had called regarding the Union's request for a payroll deduction for political contributions for employees of Bell Atlantic-Delaware represented by Local 13100. I was advised that you had spoken to a number of people and were told that a Work Authorization Request would be needed and that the programming department supposedly had a number of priority items and this could not be done for a year or more because other work must be done first.

Please be advised that the regulations of the Federal Election Commission clearly provide that, if requested, a corporation and its subsidiaries must provide a labor organization representing employees working for the corporation with the same method which the corporation uses for soliciting or collecting contributions to a political action committee. This Union has requested, and this communication may be considered as a further request, that employees of Bell Atlantic-Delaware, represented by CWA Local 13100 be permitted to execute payroll authorizations permitting a contribution to the CWA COPE (CWA Political Action Committee).

Your response to my prior oral request for such action by the Company is totally unacceptable. It is my view that your position is in clear violation of the Federal Election Campaign Act and the Regulations issued by the Federal Election Commission.

I would like to be advised immediately of the cost to the Union for the institution of a payroll deduction program for political contributions to CWA COPE (CWA Political Action Committee) for employees represented by CWA Local 13100. Unless I receive such information and unless the Company is prepared to act immediately upon our legitimate request, this Union will have no alternative but to register a complaint with the Federal Election Commission which, as you certainly know, has the power to fine a corporation for failure to comply with its obligations under the statute.

Very truly yours,


Jim Short
Assistant to Vice President
District 13

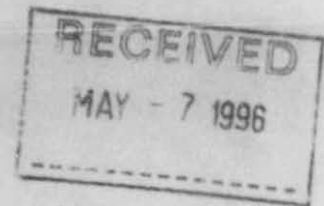
JJS/as

cc: V. Maisano, Vice President District 13
R. DeLong, Recording Secretary Local 13100

97043793008

Ex. 1

Bell Atlantic - Pennsylvania, Inc.
One Parkway, 11A
Philadelphia, Pennsylvania 19102
Fax 215 563-7028



April 25, 1996

Mr. James J. Short
Assistant to Vice President, District 13
Communications Workers of America, AFL-CIO
230 South Broad Street, 19th Floor
Philadelphia, PA 19102

Dear Mr. Short:

The Company has received the Union's letter dated April 22, 1996 regarding the establishment of a payroll deduction program for political contributions to CWA COPE (CWA Political Action Committee) for Bell Atlantic - Delaware, Inc. employees represented by CWA, Local 13100.

The Company will comply with the Federal Election Campaign Act and Regulations issued by the Federal Election Commission by establishing the payroll deduction program for the CWA COPE.

A determination of costs associated with your request will be prepared and communicated to you as quickly as possible.

Please call me if you have any questions and/or correspondence concerning this request.

Very truly yours,

W. C. Hart

cc: W. C. Hart
D. Blewett
M. Crompton

c:\13100\copepac.doc



FEDERAL ELECTION COMMISSION

Washington, DC 20463

July 31, 1996

Richard H. Markowitz, Esq.
MARKOWITZ AND RICHMAN
121 South Broad Street
Philadelphia, PA 19107

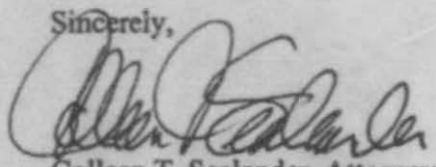
RE: MUR 4418

Dear Mr. Markowitz:

This letter acknowledges receipt on July 29, 1996, of the complaint filed by your client, James Short, alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

The respondents will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4418. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,


Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure
Procedures

9704379301C



FEDERAL ELECTION COMMISSION
Washington, DC 20463

July 31, 1996

Carolyn S. Burger, Registered Agent
901 Tatnall Street
Wilmington, DE 19801

RE:

MUR 4414

4418

Dear Ms. Burger:

The Federal Election Commission received a complaint which indicates that Bell Atlantic-Delaware, Inc. may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4414. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Bell Atlantic-Delaware, Inc. in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

97043793012



FEDERAL ELECTION COMMISSION

Washington, DC 20463

July 31, 1996

CT Corporation Systems, Registered Agent
1635 Market Street
Philadelphia, PA 19103

RE: MUR 4418

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that Bell Atlantic Corporation may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4418. Please refer to this number in all future correspondence.

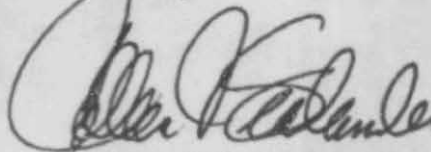
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Bell Atlantic Corporation in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

97043793013

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

97043793014



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 7, 1996

Carolyn S. Burger, Registered Agent
901 Tatnall Street
Wilmington, DE 19801

RE: MUR 4418

Dear Ms. Burger:

This is in reference to the letter dated July 31, 1996 that referenced a complaint filed by James Short. Please note that due to an administrative oversight, the Matter Under Review (MUR) number in that letter was incorrect. This correct MUR number for this matter is MUR 4418. Please refer to this number in all future communications.

Sincerely,

A handwritten signature in dark ink, appearing to read "Colleen T. Sealander", is written over a horizontal line.

Colleen T. Sealander, Attorney
Central Enforcement Docket

97043793015

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2111

(202) 371-7000

FAX (202) 393-5760

DIRECT DIAL
(202) 371-

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PRAGUE
SYDNEY
TOKYO
TORONTO

August 15, 1996

VIA FAX

Eric Brown, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

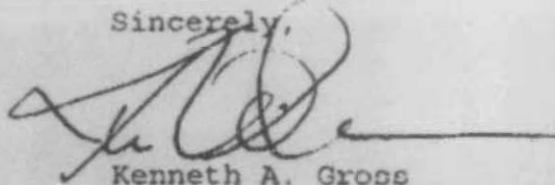
Re: MUR 4418 - Bell Atlantic Corporation
and Bell Atlantic-Delaware, Inc.

Dear Mr. Brown:

Per your discussion with my associate Ki Hong, this letter requests an extension of time of fifteen (15) days to respond to the letters dated July 31, 1996 giving notice of the complaint filed against the above mentioned respondents. Because counsel was only recently appointed to this matter, the counsel requires this additional time to review the matter and surrounding facts. Based on the date of receipt, the original response date would be August 20, 1996. If the requested extension is granted, the response will be due September 4, 1996. Enclosed please find the Statement of Designation of Counsel from those respondents.

Thank you for your consideration. If you have any questions, please call me.

Sincerely,



Kenneth A. Gross

Enclosure

97043793016

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL COUNSEL

AUG 16 10 23 AM '96

STATEMENT OF DESIGNATION OF COUNSELMUR 4418NAME OF COUNSEL: Kenneth A. GrossFIRM: Skadden, Arps, Slate, Meagher, & FlomADDRESS: 1440 New York Avenue, NWWashington, D.C. 20005TELEPHONE: (202) 371-7007FAX: (202) 371-7956

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8/14/96

Date

Michael A. Barany
SignatureRESPONDENT'S NAME: Bell Atlantic Corporation
Bell Atlantic-Delaware, Inc.ADDRESS: 1717 Arch Street32nd FloorPhiladelphia, Pennsylvania 19103

TELEPHONE: HOME ()

BUSINESS (215) 963-6404



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 19, 1996

Kenneth A. Gross, Esq.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, DC 20005

RE MUR 4418
Bell Atlantic Corporation
Bell Atlantic-Delaware, Inc.

Dear Mr. Gross:

This is in response to your letter by facsimile dated and received August 15, 1996, requesting an extension to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on September 4, 1996.

If you have any questions, please contact the Central Enforcement Docket at (202) 219-3400.

Sincerely,

A handwritten signature in dark ink, appearing to read "Colleen T. Sealander", is written over a faint, circular embossed or printed seal.

Colleen T. Sealander, Attorney
Central Enforcement Docket

97043793018

SKADDEN, ARPS, SLATE, MEAGHER & FLOW

1440 NEW YORK AVENUE, N.W.

WASHINGTON, D.C. 20005-2111

(202) 371-7000

FAX (202) 393-5760

DIRECT DIAL
(202) 371-7007

RECEIVED
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COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 4 3 02 PM '96

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FRANKFURT
HONG KONG
LONDON
MOSCOW
PARIS
PRAGUE
SYDNEY
TOKYO
TORONTO

September 4, 1996

VIA HAND DELIVERY

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

Attn: Ms. Alva E. Smith

Re: MUR 4418-Bell Atlantic Corporation
and Bell Atlantic-Delaware, Inc.

Dear Mr. Noble:

This is in response to the letter dated July 31, 1996 from the Federal Election Commission ("Commission") notifying Bell Atlantic Corporation ("Bell Corp.") and Bell Atlantic-Delaware, Inc. ("Bell Delaware") of a complaint filed by James Short, the Vice President of the Communications Workers of America ("CWA") District 13. Mr. Short claims that Bell Corp. and Bell Delaware should make a payroll deduction program available to the employees of Bell Delaware, who are represented by CWA Local 13100, to make political contributions to CWA-COPE, CWA's connected PAC.

Specifically, Mr. Short claims that under 2 U.S.C. § 441b(b)(5), respondents are required to establish the payroll deduction program for contributions to CWA-COPE because respondents already have such program for contributions to the respondents' connected PACs. He alleges that on April 22, 1996, he submitted a request to respondents that a payroll deduction program be established for Bell Delaware employees represented by CWA Local 13100 to make political contributions to CWA-COPE. He also alleges that respondents have not done anything since that request to implement such program.

97043793019

Lawrence M. Noble, Esq.
September 4, 1996
Page 2

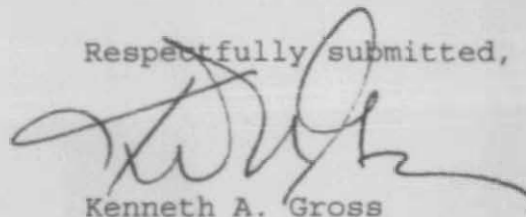
97043793020

These allegations are baseless. Even Mr. Short's complaint acknowledges that respondents agreed to establish the requested payroll deduction program. Indeed, contrary to Mr. Short's allegation that respondents did nothing to implement the program, Bell Corp. initiated internal procedures required to implement the payroll deduction program within ten (10) days of Mr. Short's request. On May 2, 1996, the Labor Relations department of Bell Corp. submitted a Contractual Agreement for Resources ("CAR") which is required to initiate internal procedures for implementing any project involving the use of Bell Corp. or Bell Delaware resources including establishing the requested payroll deduction program. A copy of the CAR is enclosed (references in the CAR to PAC/COPE are references to CWA-COPE).

Indeed, as a culmination of the internal procedures initiated by the CAR on May 2, 1996, respondents have completed establishing a payroll deduction program for Bell Delaware employees represented by CWA Local 13100 to make contributions to CWA-COPE. See enclosed Affidavit of Cheryl T. Smith. Coincidentally, this program will be able take payroll deductions beginning today, September 4, 1996. See id.

Given that respondents have established a payroll deduction program for contributions to CWA-COPE as requested by Mr. Short and that internal procedures required to establish that program were initiated promptly after that request, the Commission should find no reason to believe that a violation occurred and dismiss the complaint.

Respectfully submitted,



Kenneth A. Gross

Enclosures

Ver. 28/90

Contractual Agreement for Resources (CAR)

Page 1 of 2

Project Description: PAC/COPE Deduction for Delaware Local 13100

Customer Info -

Request Date: May 2, 1990

Job Position ID:

Name: Barbara A. Wells

Benefiting Company: DE

Phone: 703-974-5978

(Regulated Business (Y/N) YES

Director: Walter Meyer

Severity Level (1-4)

VP: P. Tyler Williams

Input Request Only

Description of Work:

-Provide the capability to accept PAC/COPE deductions for associates in Delaware Local 13100.

-Section 114.5(k) of the FEC's rules states if a corporation uses payroll deduction to collect contributions to its PAC, it must let the union collect this deduction via payroll deduction

Customer Signature: Barbara A. WellsDate: 5/2/90

Customer Address:

①

PAC/COPE

9 7 0 4 3 7 9 3 0 2 2

Payroll System Change Evaluation Worksheet

1) Non-Discretionary Changes:

1a) Is the change required because of a corporate policy decision (CEBC, NPC, etc)

Yes__ No__

(If yes attach supporting policy document and answer questions 3b and 3c)

or

1b) Is the change needed to satisfy a legal, regulatory, tax or contractual requirement.

Yes_X No__

(If yes attach supporting legal, regulatory, tax or contractual documentation and answer questions 3b and 3c)

2) Discretionary Changes:

Payroll Operations Mission:

2a) Does the proposed change

1) Reduce cost

Yes__ No__

2) Implement a process improvement

Yes__ No__

3) Eliminate non value added work

Yes__ No__

(If yes attach supporting documentation.)

and

Payroll Operations Purpose:

2b) Does the proposed change support

1) The processing, preparation or delivery of accurate paychecks

Yes__ No__

2) The timely and accurate remittance of tax payments on behalf of Bell Atlantic

Yes__ No__

3) The timely and accurate remittance of allotments on behalf of Bell Atlantic employees

Yes__ No__

4) Proper accounting and financial statement disclosure

Yes__ No__

(If yes attach supporting documentation.)

3) Scope:

3a) Is the proposed change for one company

Yes__ No__

3b) Does the proposed change call for system modifications that exceed the minimum needed to satisfy a corporate policy, legal, regulatory, tax or contractual requirement

Yes__ No_X

3c) Have you evaluated other alternatives

Yes__ No_X

(If yes attach alternative analysis documentation.)

3d) Does the proposed change correct problems with less than 25 affected employees

Yes__ No__

3e) Does the proposed change correct problems that will not be repeated

Yes__ No__

4) Cost/Benefits Analysis:

4a) Does the change result in increased net income (reduced cost outflow or increased revenue)

Yes__ No__

(If yes attach supporting documentation that includes amount or source of all benefits)

4b) Is the payback period two years or less (Answered by the Change Mgt. Coordinator)

Yes__ No__

4c) Is there a payback if the cost doubles and the benefit is cut in half (Answered by the Change Mgt. Coordinator) Yes__ No__

Corporate Legacy Systems Impact Assessment

CAR #: 023834Project Description: PAC/COPE Deduction For Delaware Local 13100Coordinator Name: Lou Di NapoliRevision #: —Coordinator Phone: 609-987-6048Revision Date: —Data Due to Chg Mgmt: 5/18/96Expedited: Yes

TO BE COMPLETED BY CHANGE MANAGEMENT

Total Cost:

(see attached for breakdown)

CLS Cost: \$7,429.50Person Hours: 89.06

CLS Additional

Cost: \$Other IS Cost: \$Total IS Cost: \$7,429.50

Comments

(attach additional pages if necessary)

Assumptions/Constraints/Risks:

Alternative Solution/Reason for Alternative (must provide an associated Work Start Description):

Additional Comments:

CLS CM Coord: Francine GiamanoData Issued: 6/12/96

97043793023

Corporate Legacy Systems Impact Assessment

(Detailed Description of Work Effort)

Summary:

The Bell Atlantic - Pennsylvania legal team requested Labor Relations provide PAC deductions for Delaware CWA (Diamond State Commercial Union).

This work request requires the Payroll System to process the PAC deductions from Associates in Delaware Local 13100.

In addition to the IS work involved, the payroll office needs to establish procedures for processing the deduction authorization cards. The union will be soliciting the 300 affected employees.

Requirements:

The bulk of the work effort impacts the BASPS Payroll system in testing the process to ensure module changes are not necessary.

Payroll database Administration:

- The Associate PAC PEN is 53870004. This is already an establish PEN on the Control File
- No PEN changes are anticipated.

On-line Services - B3V0

- The existing on-line service B3VR serves as the associate PAC Data Entry Service which the payroll office will administer
- No on-line changes are anticipated.

Remittance Batch Reports - XRAYRW00

- The existing remittance reports in module XPAY80J0 will be utilized.
- No remittance changes should be necessary

Summary

Testing the process to ensure all modules are functional is the main priority. This impact assessment allocates hours for the testing effort. Module changes are not anticipated unless a system edit prevents the Company code B9 from processing.

Testing the Process

The entire BASPS batch stream must be run to ensure the system deducted the PAC and calculated the net pay properly. Here is a brief summary of activities for the test.

- Data Entry - Enter information on B3VR for 59 employee who is union local of 3100. (The local is 13100 but the field is only 4 bytes). These are un-represented with a union affiliation code of 5.
- Execute Batch job XPAYM100. This is a base line batch job against the on-line services

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Corporate Legacy Systems Impact Assessment

- Run the daily activity job XPAYSG which will 'prove out' the on-line.
- Execute the payroll calculate job XPAY1200.
- Run the pay draft process
- Ensure accounting distribution is reconciled to ensure the liability is recorded properly.

Data Conversion Issues:

No data conversion is required as these will be new deductions.

97043793025

Corporate Legacy Systems Impact Assessment

(Work Effort Breakdown)

	ACE	ITT	RM	CAST	SQA	DATA	DEPLOY
Sys Con	6.00		0.00	0.30	0.60	0.00	0.00
Gen Dagn	6.00	0.30	0.30	0.30	0.60	0.00	0.00
Det Dagn	18.00	0.90	0.90	0.90	1.80	0.00	0.00
Sys Dev	18.00	0.90	1.80	1.80	1.80	0.00	0.00
Sys Impl	12.00	18.00	0.00	0.60	1.20	0.00	0.00
Total	60.00	20.10	3.00	3.90	6.00	0.00	0.00

CLS Applications Impacted: RASPS ___ ___
 ___ ___ ___
External Systems Impacted: ___ ___ ___
 ___ ___ ___
Impact Assessment Prepared By: B. O'Brien
Data Prepared: 8/24/96

97043793026

Project Name: PAC / COPE Deductions
Last Revision Date:
Completed By: B. O'Brien

Date: 6/21/96
Doc ID:

STATEMENT OF OBJECTIVES, SCOPE AND CONSTRAINTS

OBJECTIVES:

1. Allow BASPS Payroll to deduct PAC/COPE moneys from associates in Delaware local 13100
2. Ensure the system can function with the established payroll office procedures.
3. As a function of the system, ensure deductions are accurate and remittance is timely.

SCOPE:

The following functions must be performed by the product and are considered in-scope:

1. Testing of the BASPS system to ensure proper functionality.
2. Monitor and review test and associated results.

The following related functions have been determined to be out-of-scope for the product:

1. Requested change is within scope of the payroll system

CONSTRAINTS:

1. None identified at this time.

Project Name: PAC/COPE Deductions
Last Revision Date:
Completed By: B. O'Brien

Date: 6/24/96
Doc ID:

STATEMENT OF REQUIREMENTS

NUMBER	REQUIREMENT	CATEGORY	ACCEPTANCE CRITERIA
1	Enter PAC Deduction information on B3V0	F	Entry passed all edits
2	Ensure proper deduction after payroll process is executed	F	Authorized Deduction is correct and Net Pay is accurate
3	Remittance Reports produced with new deduction	F	Remittance totals are correct and accounting distribution is passed.

Requirement Category = F (Functional) or T (Technical)

97043793028

Project Name: PAC/COPE Deductions

Date: 6/24/96

Last Revision Date:

Doc ID:

Completed By: B. O'Brien

Traceability Type:

REQUIREMENT TRACEABILITY MATRIX

Req. #	Title	Description	Version	Source	Business Objective	Verif Type	Where Satisfied	Status	Test Script
1	On-line Service	Test on-line to ensure B9 associates can be processed			Ensure Payroll system can record new deductions for PAC		Deduction info entered successfully		
2	Run Batch process	Batch job against the on-line service to process data			Used in payroll to update deduction info on base		Deduction data extracted		
3	Run daily activity job	Daily activity job accumulates data			Used to validate the on-line session.		Deductions accurate		
4	Remittance Rpts	After the calculate and paydrift process, run the remittance process			Remittance for PAC deduction must be accurate		Verification of data entered and report		

Verification Type: CD-Conceptual Design, LD-Logical Design, PD-Physical Design, C-Construction, I-Installation, M-Maintenance, D-Documentation

Status: FC-Full Compliance, PC-Partial Compliance, TBD-To Be Determined

FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4418
Bell Atlantic Corporation and)
Bell Atlantic-Delaware, Inc.)

AFFIDAVIT OF CHERYL T. SMITH

I, CHERYL T. SMITH, being duly sworn, do depose
and say the following:

1. I am the Vice President in charge of Corporate Systems for Bell Atlantic Corporation. My department is responsible for implementing payroll deduction programs including the payroll deduction program for employees of Bell Atlantic-Delaware, Inc.
2. Corporate Systems has implemented a payroll deduction program that permits employees of Bell Atlantic-Delaware, Inc., who are represented by CWA Local 13100, to make political contributions to CWA-Cope through payroll deductions. This system is presently effective and will be able to take payroll deductions from paychecks beginning September 4, 1996.
3. It is my understanding that CWA Local 13100 will distribute the contribution cards to its members.

Cheryl T. Smith
Cheryl T. Smith

Sworn to before me this
3rd day of Sept., 1996.

Marjorie L. Walters
Notary Public

Marjorie L. Walters, Notary Public
Montgomery County
State of Maryland
My Commission Expires April 1, 1999

9704379303C

LAW OFFICES
MARKOWITZ & RICHMAN
1100 NORTH AMERICAN BUILDING
121 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19107

(215) 875-3100
TELECOPIER (215) 790-0668

DIRECT DIAL
875-3111

ALLENTOWN OFFICE
512 HAMILTON STREET
ALLENTOWN, PA 18101-1505
(610) 820-9531

NEW JERSEY OFFICE
401 COOPER LANDING ROAD, C-22
CHERRY HILL, NJ 08002-2538
(609) 858-3600

NEW YORK OFFICE
880 THIRD AVENUE
NINTH FLOOR
NEW YORK, NY 10022
(212) 752-6761

HARRISBURG OFFICE
5440 JONESTOWN ROAD
P.O. BOX 6865
HARRISBURG, PA 17112-6865
(717) 541-9475

61-13-1421

September 12, 1996

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Attn: Colleen T. Sealander,
Attorney - Central Enforcement Docket

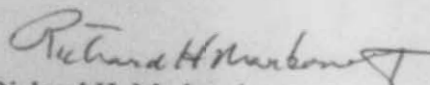
RE: **Communications Workers of America District 13, et al. and
Bell Atlantic Corporation, et al.
MUR 4418**

Dear Ms. Sealander:

Enclosed please find a request to withdraw the amended complaint in the above-captioned matter because compliance with the statute has been achieved.

Very truly yours,

MARKOWITZ AND RICHMAN


Richard H. Markowitz

RHM:RAP
Enclosure

SEP 16 10 46 AM '96
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

97043793031

BEFORE THE
FEDERAL ELECTION COMMISSION

COMMUNICATIONS WORKERS OF AMERICA :
DISTRICT 13 and :
COMMUNICATIONS WORKERS OF AMERICA :
LOCAL 13100 :

v. :

MUR 4418

BELL ATLANTIC CORPORATION and :
BELL ATLANTIC-DELAWARE :

REQUEST TO WITHDRAW AMENDED COMPLAINT

9 7 0 4 3 7 9 3 0 3 2

Communications Workers of America ("CWA") District 13 and Communications Workers of America ("CWA") Local 13100 request the withdrawal of this Amended Complaint against Bell Atlantic Corporation and against Bell Atlantic-Delaware, Inc. The reason for this withdrawal is that Bell Atlantic Corporation and Bell Atlantic-Delaware, Inc., have now complied with what CWA believes to be their statutory obligation and have established a payroll deduction program for political contributions to CWA-COPE for employees of Bell Atlantic-Delaware, Inc., represented by CWA Local 13100.

THEREFORE, CWA requests withdrawal of the Amended Complaint in this matter because Respondents have complied with the purposes of the Complaint and with their statutory obligation.

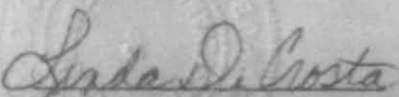
Dated: 9-12-96

By: 

James Short
Assistant to the Vice President
Communications Workers of America
District 13

19th Floor
230 South Broad Street
Philadelphia, PA 19102
215-546-5574

Sworn to and subscribed before
me this day 12th of September, 1996



Notarial Seal
Linda DiCrista, Notary Public
Philadelphia, Philadelphia County
My Commission Expires Jan. 13, 1997
Member, Pennsylvania Association of Notaries



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 17, 1996

Richard H. Markowitz, Esq.
MARKOWITZ AND RICHMAN
121 South Broad Street
Philadelphia, PA 19107

RE: MUR 4418

Dear Mr. Markowitz:

This is in reference to your letter dated September 12, 1996, requesting that the complaint your client, James Short, filed be withdrawn.

Under 2 U.S.C. § 437g, the Federal Election Commission is empowered to review a complaint properly filed with it and to take action which it deems appropriate under the Federal Election Campaign Act of 1971, as amended ("the Act"). A request for withdrawal of a complaint will not prevent the Commission from taking appropriate action under the Act. Your request will become part of the public record within 30 days after the entire file is closed.

If you have any further questions about this procedure, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

97043793033

BEFORE THE FEDERAL ELECTION COMMISSION

MAR 5 11 40 AM '97

In the Matter of

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)
)
)

ENFORCEMENT PRIORITY

SENSITIVE

GENERAL COUNSEL'S REPORT

MAR 11 1997

EXECUTIVE SESSION

I. INTRODUCTION

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing such cases permits the Commission to focus its limited resources on more important cases presently pending before it. Based upon this review, we have identified 25 cases which do

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not warrant further action relative to other pending matters.¹ Attachment 1 to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more remote and consequently more difficult to develop. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community.

¹ These cases are: MUR 4332 (Bill Thomas Campaign Committee); MUR 4347 (Anonymous Respondent); MUR 4354 (Brian Steel for Congress); MUR 4367 (Philipstown Republicans); MUR 4371 (Employment Group); MUR 4373 (Cannon for Congress); MUR 4374 (Mark Stodola for Congress Primary Committee); MUR 4375 (Westchester County Conservative Party); MUR 4377 (Braxton for Congress); MUR 4379 (Teamsters Local Union No. 135); MUR 4383 (Pauken for Congress); MUR 4384 (Willie Colon for U.S. Congress); MUR 4388 (Bill Witt for Senate and Congress); MUR 4390 (Kolbe 96); MUR 4391 (Pat Roberts for Congress Committee); MUR 4393 (Cecil J. Banks); MUR 4397 (AFL-CIO); MUR 4405 (Katz for Congress Committee); MUR 4411 (First Evangelical Presbyterian Church); MUR 4414 (Turietta-Koury for Congress Committee); MUR 4418 (Bell Atlantic); MUR 4421 (Butler for Mayor); MUR 4448 (Friends for Jim Rapp); Pre-MUR 334 (Kinnamon for Congress); and Pre-MUR 335 (Davis for Congress).

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We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale

12 are not worthy of further action, and merit closure.⁴

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective April 1, 1997. Closing these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

⁴ These cases are: MUR 4139 (*Enid 94*); MUR 4150 (*Frank Fasi*); MUR 4257 (*DSCC*); MUR 4258 (*NRSC*); MUR 4260 (*Packwood & Auto Dealers*); MUR 4261 (*NRA Institute for Legis.*); MUR 4262 (*Oregon Republican Party*); MUR 4265 (*NRSC; Sen. Phil Gramm*); MUR 4272 (*Bishop for Congress*); MUR 4279 (*Russ Berrie Co.*); MUR 4284 (*United We Stand America*); and Pre-MUR 322 (*Royal Hawaiian Country Club*).

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III. RECOMMENDATIONS.

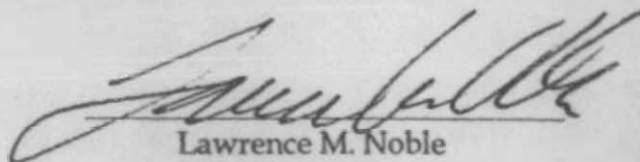
A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322
2. Pre-MUR 334
3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- | | | |
|--------------|--------------|--------------|
| 1. MUR 4139 | 13. MUR 4347 | 25. MUR 4390 |
| 2. MUR 4150 | 14. MUR 4354 | 26. MUR 4391 |
| 3. MUR 4257 | 15. MUR 4367 | 27. MUR 4393 |
| 4. MUR 4258 | 16. MUR 4371 | 28. MUR 4397 |
| 5. MUR 4260 | 17. MUR 4373 | 29. MUR 4405 |
| 6. MUR 4261 | 18. MUR 4374 | 30. MUR 4411 |
| 7. MUR 4262 | 19. MUR 4375 | 31. MUR 4414 |
| 8. MUR 4265 | 20. MUR 4377 | 32. MUR 4418 |
| 9. MUR 4272 | 21. MUR 4379 | 33. MUR 4421 |
| 10. MUR 4279 | 22. MUR 4383 | 34. MUR 4448 |
| 11. MUR 4284 | 23. MUR 4384 | |
| 12. MUR 4332 | 24. MUR 4388 | |

3/5/97
Date


Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document #X97-16
Enforcement Priority)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 11, 1997, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned matter:

- A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322;
2. Pre-Mur 334;
3. Pre-MUR 335.

- B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- | | |
|--------------|---------------|
| 1. MUR 4139; | 10. MUR 4279; |
| 2. MUR 4150; | 11. MUR 4284; |
| 3. MUR 4257; | 12. MUR 4332; |
| 4. MUR 4258; | 13. MUR 4347; |
| 5. MUR 4260; | 14. MUR 4354; |
| 6. MUR 4261; | 15. MUR 4367; |
| 7. MUR 4262; | 16. MUR 4371; |
| 8. MUR 4265; | 17. MUR 4373; |
| 9. MUR 4272; | 18. MUR 4374; |

(continued)

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Federal Election Commission
Certification: Enforcement Priority
March 11, 1997

Page 2

19. MUR 4375;	27. MUR 4393;
20. MUR 4377;	28. MUR 4397;
21. MUR 4379;	29. MUR 4405;
22. MUR 4383;	30. MUR 4411;
23. MUR 4384;	31. MUR 4414;
24. MUR 4388;	32. MUR 4418;
25. MUR 4390;	33. MUR 4421;
26. MUR 4391;	34. MUR 4448.

Commissioners Aikens, Elliott, McDonald, McGarry,
and Thomas voted affirmatively for the decision.

Attest:

3-12-97
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

April 1, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard H. Markowitz, Esq.
MARKOWITZ AND RICHMAN
121 South Broad Street
Philadelphia, PA 19107

RE: MUR 4418

Dear Mr. Markowitz:

On July 29, 1996, the Federal Election Commission received the complaint filed by your client, James Short, alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on April 1, 1997. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

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MUR 4418
Bell Atlantic

James Short, Assistant to the Vice President of Communication Workers of America (CWA) District 13, filed a complaint, through his attorney, Richard H. Markowitz, on behalf of District 13 and CWA Local 13100. Mr. Short alleges that Bell Atlantic-Delaware, Inc., a subsidiary of Bell Atlantic Corporation, failed to establish a payroll deduction program for contributions to the CWA COPE for its employees under 2 U.S.C. § 441b(b)(5), following a written request for such a program by the union on or about April 22, 1996. The complainant filed his request in July 1996, asserting that no action had been taken on his request. He maintains that such a program is lawful, proper, and consistent with a similar payroll deduction plan for contributions to the employer's separate segregated fund by non-union employees of Bell Atlantic - Delaware.

In response to the complaint, the respondents affirm that they agreed to set up such a plan for the CWA-COPE and had in fact done so: effective date of the payroll deduction program was September 4, 1996, the same day when the response was submitted. On September 12, 1996, complainant's counsel requested that the complaint be withdrawn due to the respondents' compliance with the statute.

This matter is less significant relative to others pending before the Commission and evidences no intent to violate the FECA.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

Kenneth A. Gross, Esquire
SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 New York Avenue, NW
Washington, D.C. 20005

RE: MUR 4418
Bell Atlantic Corporation and Bell Atlantic-Delaware, Inc.

Dear Mr. Gross:

On July 31, 1996, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on April 1, 1997.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley /
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

97043793042

MUR 4418
Bell Atlantic

James Short, Assistant to the Vice President of Communication Workers of America (CWA) District 13, filed a complaint, through his attorney, Richard H. Markowitz, on behalf of District 13 and CWA Local 13100. Mr. Short alleges that Bell Atlantic-Delaware, Inc., a subsidiary of Bell Atlantic Corporation, failed to establish a payroll deduction program for contributions to the CWA COPE for its employees under 2 U.S.C. § 441b(b)(5), following a written request for such a program by the union on or about April 22, 1996. The complainant filed his request in July 1996, asserting that no action had been taken on his request. He maintains that such a program is lawful, proper, and consistent with a similar payroll deduction plan for contributions to the employer's separate segregated fund by non-union employees of Bell Atlantic - Delaware.

In response to the complaint, the respondents affirm that they agreed to set up such a plan for the CWA-COPE and had in fact done so: effective date of the payroll deduction program was September 4, 1996, the same day when the response was submitted. On September 12, 1996, complainant's counsel requested that the complaint be withdrawn due to the respondents' compliance with the statute.

This matter is less significant relative to others pending before the Commission and evidences no intent to violate the FECA.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4418

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN JmJ

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