

PERKINS COIE LLP

607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2065
TELEPHONE: 202 628-6600 • FACSIMILE: 202 434-1690

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August 4, 2000

SENT VIA FACSIMILE AND U.S. MAIL

Jonathan Levin, Esq.
Office of the General Counsel
Federal Election Commission
Washington, DC 20463

Re: Advisory Opinion Request 2000-16

Dear Johnny:

Per Commissioner Sandstrom's request at the Commission's recent meeting, enclosed please find a description of survey methodology prepared by Third Millennium: Advocates for the Future, Inc. I have also e-mailed you an electronic version of the document.

If you have any questions, please let me know.

Very truly yours,



Brian G. Svoboda
Counsel to Third Millennium: Advocates for
the Future, Inc.

Enclosure

[09901-0001/DA003679.668]

Following Stage 3, *Third Millennium* will sort the data and attempt to address the three key hypotheses above. If those subscribers who view Internet ads voted at statistically significantly higher rates than the control group that was not exposed to Internet advertising, then one can conclude that:

- a) there is a strong correlation between viewing these ads and voting behavior, and
- b) perhaps, *ceteris paribus*, the advertising caused the increase in turnout.

More important, if we demonstrate that young adults are receptive to advertising through this medium, we will have discovered a cost-effective outlet for reaching this demographic in subsequent elections.

Evaluation

The entire Internet Advertising and the 2000 Presidential Campaign project has been under academic scrutiny since its conception. There are numerous academics—experts the field of civic participation and political science—who serve on the project's advisory board. These include Dr. Susan MacMamus, professor at the University of South Florida (Tampa), Dr. Robert Eisinger, professor at Lewis and Clark College in Portland, Ore, and John Harrison (Western Connecticut State University).

Once all three stages of the project have been completed, all of our results will be subject to strict evaluation and submitted for peer review among academics who have had no association with our work. All components of the project will be evaluated, including project design, survey methodology, balance across all advertising, and accuracy of data generated.

Finally, our results will be presented to professionals of all political ideologies at a major conference *Third Millennium* plans to host in December 2000. Our intention is to get our findings into the hands of as many political media consultants as possible, with the hope that it will be used in subsequent elections to target young adults and inspire them to participate in the political process.

Neglection 2000: Internet Advertising and the 2000 Presidential Campaign

Objective: To measure whether repeated exposure to positive Internet advertisements from presidential candidates affects voter participation among young adults.

Hypotheses:

- 1) Among adults surveyed around Labor Day 2000 who indicate they are "not likely" or only "somewhat likely" to vote, those individuals who subsequently view repeated presidential candidate Internet ads will end up voting in higher numbers than those who do not see any ads at all.
- 2) Adults ages 18-34 comprise the age cohort most likely to be persuaded to vote after viewing repeated presidential candidate Internet ads.
- 3) While exposure to presidential candidate Internet advertisements will increase turnout, this will not be dependent upon whether a viewer sees ads from one candidate or multiple candidates.

Project: *Third Millennium* proposes to test these hypotheses by conducting a three-stage project.

Stage 1: In late August 2000, the Internet Service Provider Juno will send a questionnaire to exactly 250,000 of its members ages 18+, informing them that they will part of a research project about viewing political advertisements on the Internet.

This questionnaire will ask the following questions [WORDING TO BE FINALIZED]:

1. If the election were held today, how likely are you to vote in the 2000 presidential campaign? [Rotate answers]
 - a) Not likely
 - b) Somewhat likely
 - c) Most likely
2. If you are somewhat likely or very likely to vote, for whom do you plan to vote? [Rotate answers]

Governor George W. Bush
Vice President Gore
Ralph Nader
Patrick Buchanan
Harry Browne
Other

3. Did you vote in the 1996 presidential campaign?

Yes

No

4. How would you describe your party affiliation?

Strong Democrat
Weak Democrat
Independent
Weak Republican
Strong Republican
Other

The 250,000 people who are asked to fill out the survey will be told they are part of study looking at the influence of the Internet on political participation.

Juno anticipates that approximately 40,000 people will respond to the survey; these individuals will be the subjects for the Stage 2 of the project. The other 210,000 will not be contacted again and will not participate in Stages 2 and 3.

Juno has already compiled extensive demographic data on each of its subscribers. This data was provided by subscribers themselves when they joined the service, in order to receive the service for free.

This data will enable Third Millennium to create a detailed aggregate portrait of subscribers' interests and behavior. However, Third Millennium has no access to and no interest in specific subscribers' demographic and psychographic information. Additionally, although Juno has access to the subscribers' phone numbers and home addresses, Third Millennium will not conduct a telephone or U.S. mail survey of these subscribers. Rather, demographic and geographic information will be used generically (i.e., suburban subscribers voted more than urban voters), not "Jane Doe from 123 Main Street in Anytown, USA" voted, and Harry Jones did not.

Moreover, Third Millennium in no way intends to influence the outcome of the 2000 election. This research design is employed specifically to test the response rate of the sample population, and not impact the election in any way.

The pool of 40,000 enables Third Millennium to identify statistically significant relationships among specific sub-groups. For example, this research design allows for comparisons across gender, region and income.

Finally, responses to the survey will have no effect on which ads are viewed by those who participate in the study. For example, a Juno subscriber who indicates that he is "somewhat likely" to vote, and is inclined to vote for Candidate A, has an equal chance of seeing an ad (or a series of ads) for Candidate A as he does for all other candidates. Thus, in the aggregate, no candidate will enjoy a competitive advantage.

Stage 2: The pool of 40,000 will be randomly divided into equal-sized (4,000 each) sub-groups. One group will view no Internet political advertising at all throughout the campaign season that commences on Labor Day and ends on Election Day; this group will be the control group. A second group (n= 4,000) will view advertisements only for Democratic presidential nominee Vice President Al Gore. A third group (n=4,000) will view Internet advertisements only for Governor George W. Bush. Other groups of 4,000 will see ads for specific ballot-qualified third-party candidates. The last group (n=4,000) will view a random mix of ads from all the ballot-qualified candidates. Note that all groups will be equal in size, and each group will view the same number of advertisements. That is, exposure to advertisements will be identical across each group.

The Internet advertisements will be of the "pop-up" variety, meaning that in order to receive or send e-mail through Juno, one must view a full-screen ad and then actively (using a mouse) click the advertisement off one's screen in order to continue using Juno. Users of this service are aware that pop-up ads are part of the environment and accept these ads as a condition for receiving Juno's free services.

The ads will be created in one of two ways. Option One is to have each respective presidential campaign provide content and design that may be used for the experiment. If this option were chosen, letters to each campaign will be sent on August 11th, in the hopes of receiving a response by August 21st. Juno will reserve the right to reject a campaign-generated ad that does not meet the criteria of the project. Specifically, none of the ads for a particular candidate will mention or allude to his/her opponents. Instead, each candidate's ad must put forth a positive message about that particular candidate.

Option Two entails having Juno create ads for the project based upon publicly available information from the candidates (such as from their websites).

Between Labor Day and Election Day 2000, each participant in the study (excluding the control group) will be exposed to a total of 15 to 20 advertisements.

Stage 3: On the day after the election, Juno will survey the 40,000 participants in the study. They will ask these two questions:

- 1) Did you vote for a presidential candidate on Election Day?
Yes No
- 2) If so, for whom did you vote? [Rotate Answers]

Vice President Gore
Governor George W. Bush
Ralph Nader
Patrick Buchanan
Harry Browne
Other