

Arlen  
**Specter**  
'96

Box 1996  
1530 Locust Street  
Philadelphia, Pennsylvania 19102

August 16, 1995

202.639.9315  
202.639.5028 Facsimile

The Honorable Danny L. MacDonald  
Chairman  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**AOR 1995-30**

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

AUG 17 3 51 PM '95

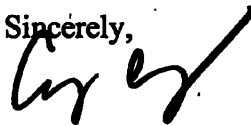
Dear Chairman MacDonald:

I am writing to provide additional information regarding my advisory opinion request dated August 14, 1995, as solicited by the General Counsel in his letter of August 15. The issue in my advisory opinion request is the allocation of satellite broadcast expenses.

1. In our proposal, either one State or several States would be targeted in the satellite link at the same time. For example, during a 30-minute period, there could be three television news interviewers from one State or three from three different States. We would still publicize the interview nationally, offering television news media in other States the chance to monitor (but not participate). For the purposes of your advisory opinion, you may wish to note the Commission policy with respect to single State and multi-State satellite news conferences.
2. At present, the Specter campaign has used satellite broadcast interviews in Iowa and plans a series of such interviews shortly in New Hampshire and Washington State. The campaign expects to incur similar broadcast expenses for interviews involving television news media in any and all States. (Some New England States may be combined for a regional broadcast.) The typical fee for satellite time is between \$600-\$700 per half hour. The rate varies by time of day. This fee includes both the satellite uplink and the studio time. The cost is incurred in Washington, D.C., where the candidate uses a rented television studio. The cost is unrelated to where the television news media are located. Thus, there is no cost in each State, contrary to the suggestion in Mr. Noble's August 15 letter.
3. The candidate would not typically make any prepared statements during a satellite interview. Other than some brief welcoming/establishing remarks (30 seconds), the typical 10-minute interview is devoted to questions from the participating journalist.

I welcome any additional questions you might have and look forward to the Commission's prompt response to our advisory opinion request.

Sincerely,



Craig Snyder  
Deputy Chairman

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

AUG 17 4 23 PM '95



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 15, 1995

Craig Snyder, Deputy Chairman  
Arlen Specter '96  
Suite 517  
444 North Capitol Street  
Washington, D.C. 20001

Dear Mr. Snyder:

This refers to your letter dated August 14, 1995, on behalf of Arlen Specter '96 (the "campaign") requesting an advisory opinion concerning the application of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Commission regulations to the allocation of satellite broadcast expenses.

You state that the campaign intends to rent satellite time for media availability sessions. The campaign proposes to enter into an agreement with a commercial vendor to use their satellite broadcast facilities for a designated period of time (i.e. 30 minutes). The campaign would then issue a press release to television news organizations in a given State saying that the candidate would be available to answer their questions at the designated time. You explain that a similar press release will also be sent out nationwide, offering the news media the opportunity to monitor, via satellite, the interviews that are performed by the media for the selected State. During the media availability session, the candidate is linked via telephone and satellite to the television media representatives who have chosen to participate in the interview session. You state that the candidate would answer the questions as in an ordinary face-to-face press conference, with no control over their content.

You state your belief that the use of such satellite time is comparable to a press conference actually held in the State because in both cases the television news representatives have the opportunity to ask questions with no restrictions as to content. You also note that the news media throughout the nation have the opportunity to monitor the interviews and use the videotape just as when a press conference occurs in a given state.

Mr. Craig Snyder

Page 2

The Act authorizes the Commission to issue an advisory opinion in response to a "complete written request" from any person with respect to a specific transaction or activity by the requesting person. 2 U.S.C. §437f(a). Commission regulations explain that such a request "shall include a complete description of all facts relevant to the specific transaction or activity with respect to which the request is made." 11 CFR 112.1(c).

After reviewing your letter this office has determined that additional facts and information from you are necessary to consider your inquiry. Therefore, please provide the following information:

1. Explain whether, in your proposal, several States would be included in the satellite link at the same time so that the candidate would be asked questions from media personnel located in several different States during the same interview session.

2. Identify the States you intend to include in your proposal, as well as the anticipated cost of this procedure in each State.

3. State whether, in your proposal, the candidate would make any prepared statements regarding various campaign issues prior to the start of the questions. If so, what would be the proportion of time allotted to the prepared statements, as compared to interview time.

After receiving responses to the above questions, this office and the Commission will give further consideration to your inquiry as an advisory opinion request. If you have any questions concerning the advisory opinion process, or this letter, please contact the undersigned.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:

  
N. Bradley Litchfield  
Associate General Counsel