



## U.S. CHAMBER OF COMMERCE

Judith K. Richmond  
Associate General Counsel

June 20, 1994

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

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Marjorie Emmons  
Secretary  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

RE: AOR 1994-4

Dear Ms. Emmons:

The following constitutes the comments of the U.S. Chamber regarding the above draft advisory opinion.

The reference to a "50-person Board of Directors" on page 8 of the draft advisory opinion is incorrect. While the Chamber's Board includes 50 elected directors, it also includes the Chamber's officers and members of the Senior Council. Accordingly, when fully represented, there are a total of 63 members on the Board of Directors of the U.S. Chamber.

The Chamber also believes that the Commission's reliance on the Supreme Court's decision in FEC v. National Right to Work Committee, 459 U.S. 197 (1982) is erroneous. The facts in that case were by no means analogous to the facts presented here, and the Chamber's membership criteria are far more stringent than those of the Right to Work Committee. In responding to the Chamber's Advisory Opinion Request, the Commission requested, and was provided with, a full analysis of the Chamber's membership structure, including a detailed analysis of dues payments and membership rights. It should be clear from that data that Chamber members do indeed have a significant attachment to the organization, and that its members are indeed "legitimate" for purposes of receiving partisan communications and contribution solicitations.

Sincerely,

A handwritten signature in cursive script, reading "Judith K. Richmond".

Judith K. Richmond

cc: N. Bradley Litchfield