



July 27, 2018

Chair Caroline C. Hunter  
Vice Chair Ellen L. Weintraub  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

Dear Chair Hunter and Vice Chair Weintraub,

On July 26, 2018, an industry trade association provided to three Commissioners in the Commission's hearing room a 70-minute "informational session" on the trade association's "Self-Regulatory Principles of Transparency & Accountability [for] Political Advertising." The trade association that conducted this session had previously submitted written and in-person testimony to the Commission on the same topic.

We hope Commissioners found the trade association's supplemental testimony to be informative.

The Campaign Legal Center, as a fellow submitter of written and in-person testimony on these issues, respectfully requests the opportunity to host a 70-minute informational session for Commissioners at the Commission's headquarters on regulatory principles of transparency and accountability for political advertising. Specifically, this session would provide Commissioners with additional factual information regarding how unlawful, foreign-financed digital advertising could be detected and deterred by a regulation effectuating the Commission's statutory mandate to ensure that certain categories of advertising carry conspicuous disclaimers.

We note that, due to the 30-day congressional review period for new Commission rules, the Commission will need to publish its final rules on this topic by approximately September 12 for those rules to go into effect at the

beginning of the next election cycle in January 2019.<sup>1</sup> Therefore, we respectfully request that our information session be scheduled at a time convenient for Commissioners that allows the information we provide to be incorporated into the final rule that the Commission will publish by mid-September.

Unlike the July 26 event, which was not (and as of this writing still is not) listed on the Commission's public calendar, and which appears to have been announced publicly for the first time on the morning of July 26, we would request that the public be given adequate advance notice of our informational session.

Thank you for your consideration of this request. We look forward to the opportunity to provide you with additional factual information on this issue.

Respectfully submitted,

/s/ Adav Noti

Adav Noti  
Senior Director, Trial Litigation

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<sup>1</sup> See 52 U.S.C. § 30111(d); Majority Leader Kevin McCarthy, *House Calendar*, [https://www.majorityleader.gov/wp-content/uploads/2018/05/2018\\_CAL.pdf](https://www.majorityleader.gov/wp-content/uploads/2018/05/2018_CAL.pdf) (last visited July 27, 2018).