



12/15/2014 11:08 AM

To SERS@fec.gov,
cc
bcc
Subject New comment on REG 2014-06 submitted by MacNamara,
Elisabeth

2 attachments



REG_2014_06_MacNamara_Elisabeth_12_15_2014_11_08_03_COMMENTS - TO THE FEDERAL ELECTION COMMISSION docx - D



REG_2014_06_MacNamara_Elisabeth_12_15_2014_11_08_03_CommentText.txt

Please find attached the contents for the new comment submitted on Mon Dec 15 11:08:03 EST 2014.

User uploaded 1 file(s) as attachment to the comment. Please find them attached to this email.

You will also find a Comment.txt file attached, which has the text comments entered by the user.

You may review the comment in FRAPS system. An approval action from FRAPS is required to send this comment event to the CMS. Thanks.

COMMENTS TO THE FEDERAL ELECTION COMMISSION on
11 CFR PART 110.13 (c) (Notice 2014-13)
RULEMAKING PETITION: CANDIDATE DEBATES
BY
LEAGUE OF WOMEN VOTERS OF THE UNITED STATES
ELISABETH MACNAMARA, PRESIDENT
December 15, 2014

The League of Women Voters has a long history and much experience in conducting candidate debates at all levels of elected office, including those for president and vice president. As such, we have a continuing interest in ensuring that such debates, including those sponsored by other organizations, are conducted in a fashion that provides the most amount of useful information to voters about candidates who seek to represent them. We believe it is beneficial to review policies and procedures related to the conduct of candidate debates to determine if changes are needed to ensure that legitimate candidates are enabled to present their views to the public in a manner that is fair to the candidates and useful to the viewing public.

Consequently, the League supports the petitioner's request that the Federal Election Commission (FEC) open a rulemaking on its regulation concerning the criteria governing the inclusion of candidates in presidential and vice presidential candidate debates.

However, the League does not support amending the FEC regulation to preclude sponsors of general election presidential and vice presidential debates from requiring that a candidate meet a polling threshold in order to be included in the debate.⁽¹⁾ In fact, we believe that polling data is a legitimate indicator in determining debate eligibility. Based upon our reading of the petition submitted to the FEC, however, it is our understanding that this is not the intent of the petitioner either. Page 23 of the petition states:

Petitioner does not oppose using debate selection criteria that take into account viability of a contender in the general presidential election. The sheer number of declared candidates for president requires some limiting principles to govern debate access. Petitioner does not even oppose a debate sponsor allowing candidates to participate if they meet a polling threshold, so long as the sponsor provides an alternative avenue for gaining entry to debates that does not rely on polling.

The League is neither supporting nor opposing any of the specific recommendations proposed in the submitted petition at this time. However, we do support the request that the FEC proceed to undertake a rulemaking focused on the criteria governing inclusion in presidential and vice presidential candidate debates.

Thank you for the opportunity to comment. The League commends the FEC for considering the request to review and revise these criteria, and we urge the agency to proceed to do so.

League of Women Voters of the United States
1730 M Street, NW #1000
Washington, D.C. 20036
202 429-1965
www.lwv.org

(1) Supplementary Information section of FEC Notice 2014-13, concerning rulemaking petition on candidates (11 CFR 110)

Comments provided by :
MacNamara, Elisabeth

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