

Arent Fox

July 21, 2009

VIA E-MAIL

Mr. Robert Hickey
Staff Director
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Craig Engle

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Re: Comments on Web Site and Internet Communications Improvement Initiative

Dear Mr. Hickey:

I would like to file the following comments pursuant to Notice 2009-10. I commend the Commission on its openness and willingness to receive constructive input from the public about the Commission's operations and hope you find the following suggestions helpful. If the Commission would like me to expound upon these suggestions at the scheduled hearing, I would be happy to do so.

Excess White Space in Reporting Forms

In an effort to streamline the data being reported and reduce the number of physical pages printed, I would propose a rethinking of the structure and layout of the committee contribution and expenditure reporting forms particularly form 3X. The current layout of form 3X only allows for three receipt or disbursement transactions per page. Given the relatively small amount of information required for each transaction, the form could easily be redesigned to accommodate upwards of twelve transactions. While elements of the paperless office have been achieved, every practitioner I know still ultimately must print and retain at least one paper copy of each report submitted to the Commission. Utilizing the entire page, even if just in the printable version of the reports made accessible on the Commission website, would save countless volumes of paper and other resources.

Reliability

In my experience, the current search functions available in the Campaign Finance Reports and Data section work on an intermittent basis. Frequently search queries return a blank white page. The functionality of the search options does not seem tied to reporting dates or high traffic time periods. The unpredictable nature of the search functions is disappointing and time consuming.

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Searchable FEC Reports

In addition to being able to search for a donor using the Disclosure Database, it would be useful to have the ability to search within an actual FEC report. The ability to search for donors, vendors, and other information from a specific reporting period would reduce the amount of individual searches necessary to locate information.

Disbursement Disclosure Database

Similar to the Donor Disclosure Database, the creation of a searchable database listing all persons, vendors or organizations receiving funds from each reporting entity would be useful. A database of this nature would allow for much greater transparency into the use of political donations. This would allow donors the ability to gain a general understanding of the types and levels of expenses an organization or campaign is incurring. Subsequently, it would also provide political organizations with another reason to monitor its spending knowing a complete breakdown of its disbursements are readily available.

Hyperlinks

There are many areas where the utility of the information disclosed on the Commission's website could be improved through the use of hyperlinks to additional documents. The most notable example of this is in connection with the Advisory Opinion database. The ability to instantly bring up previous Advisory Opinions cited within later opinions would be an enlightening tool for both practitioners and the general public.

Sincerely,



Craig Engle