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October 31, 2011

Congressman Gregg Harper
Chairman
Congressman Charles Gonzalez
Ranking Member
Subcommittee on Elections
Committee on House Administration
1309 Longworth House Office Building
Washington, D.C. 20515

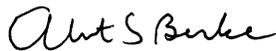
Dear Chairman Harper and Ranking Member Gonzalez:

We write to you today as the bipartisan chairs of the Political Law Group at McGuireWoods LLP in anticipation of a hearing you have noticed for November 3, 2011, in which Commissioners of the Federal Election Commission (FEC or Commission) are scheduled to appear as witnesses. The comments we discuss herein are our own and do not necessarily represent the opinion of other members of our practice group or that of our firm.

Together, we have a combined thirty years of experience in representing clients before the FEC. We have determined that the more guidance that is issued by the FEC, the greater the ability political committees have to adhere to both the letter and spirit of the Federal Election Campaign Act and the regulations promulgated thereunder.

During a hearing held by the FEC in 2009, a discussion occurred regarding the need for the Commission to make public its internal enforcement manual and guidelines. The lack of transparency that binds FEC Office of General Counsel attorneys in their negotiations and dealings does a disservice to both the FEC and respondents to enforcement proceedings. If the Department of Justice can recognize the public interest in making available its U.S. Attorneys' Manual, the FEC can most certainly do the same with respect to its enforcement guidelines. We encourage you to make this request to the Commissioners appearing before your Committee on November 3.

Sincerely,



Elliot S. Berke



William J. Farah