

# A R I S T O T L E

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205 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003

November 16, 2011

Shawn Werth  
Secretary  
Federal Election Commission  
999 E St., NW  
Washington, DC 20463

By fax:

RE: Comment on AOR 2011-19 (Giving Sphere)

Dear Madam Secretary:

The following views are submitted on behalf of Aristotle International, Inc.

### Aristotle's Interest

Aristotle provides web services and credit card payment services to political committees and related entities. For two decades Aristotle has been a leader in political contribution processing. (See, e.g. Advisory Opinion 1999-22.)

### Discussion

The analysis of the draft advisory opinion is correct that Giving Sphere proposes to engage in a combination of activities which have previously been approved by the commission or are logical and limited extensions of activities previously approved.

Of particular importance in the web context is approval of Giving Sphere's proposal to provide customers with a database to identify candidates and political committees to whom customers may choose to make contributions and to include basic factual information about those candidates and committees.

A unique aspect of the internet as compared to traditional media is its omni-directional communications ability. Traditional mass media, such as broadcast, mail, or other print communications originate with a sender and are directed to targeted recipients. In the political context with traditional media, campaigns, PACs and parties are initiators and citizens are simply

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consumers or recipients of messages or appeals. On the Internet, individuals or small groups of citizens can easily initiate political activity on their own; individuals can seek candidates who they support rather than having candidates target individuals. (Explanation and Justification, Internet Communications, 71 FR 18589).

While there are a number of useful political contribution portals on the Internet, the largest portals are partisan in nature and often registered as or operated by political committees (e.g. ActBlue). Clarifying that entities may provide basic factual information about candidates along with contribution processing services without thereby becoming a political committee is important to advancing the ability of the internet to empower individual citizens as political actors and initiators, regardless of their partisan preferences.

**Conclusion**

The Commission should approve the draft Advisory Opinion.

Sincerely,



David M. Mason  
Senior Vice President,  
Compliance Services,  
Aristotle international