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September 14, 2016

New York City Campaign Finance Board
100 Church Street, 12th Floor
New York, NY 10007

Dear Commissioners:

I write on behalf of my clients ALIGN: The Alliance for a Greater New York, the Alliance for Quality Education, Citizen Action of New York, Make the Road New York, and New York Communities for Change. All five are nonprofits engaged in organizing and/or grassroots legislative advocacy among and on behalf of underrepresented communities including immigrants, communities of color, tenants, families with children in public schools, and low income and working class New Yorkers. All share the Campaign Finance Board's goal of increasing participation in the political process among their constituencies.

My clients have reviewed the Board's proposed regulations to determine what effect these rules will have on legitimate grassroots issue advocacy. All are concerned that their issue advocacy activities will be burdened or effectively restrained by the presumption of coordination in the proposed rules, read together with the presumption of connection to a covered election articulated in AO 2016-01.

Moreover, given the importance and complexity of the issues involved, my clients ask that the Board extend the public comment period to provide the Board with sufficient time to gather further information on the broad range of legitimate, protected activities that would be affected by the approach advanced in the proposed regulations when read together with the July advisory opinion.

Thank you in advance for your consideration.

Very truly yours,

Alexander Rabb

ACR:acr

September 12, 2016

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Cc: Matthew Ryan, ALIGN: The Alliance for a Greater New York
Billy Easton, Alliance for Quality Education
Karen Scharff, Citizen Action of New York
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