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November 24, 2003

Mr. John C. Vergelli  
Acting Assistant General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Re: Rulemaking Petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund

Dear Mr. Vergelli:

The American Bankers Association ("ABA") appreciates the opportunity to comment in favor of America's Community Bankers' ("ACB") Petition for Rulemaking urging the Federal Election Commission ("the Commission") to "revise the rule prohibiting the use by member corporations of payroll deductions for contributions to a trade association's separate segregated fund." ABA brings together all categories of banking institutions to best represent the interests of this rapidly changing industry. Its membership--which includes community, regional, and money center banks and holding companies, as well as savings associations, trust companies and savings banks--makes ABA the largest banking trade association in the country.

ABA urges the Commission to act favorably on ACB's petition and conduct a rulemaking on the issue of permitting the use of payroll deductions for contributions to a trade association's separate segregated fund by a member corporation's executive and administrative personnel.

If you have any questions or need additional information regarding this letter, please do not hesitate to contact the undersigned at 202-663-5434.

Sincerely,

A handwritten signature in cursive script, appearing to read 'C. Dawn Causey'.

C. Dawn Causey  
General Counsel