

Public Comment on Digital Advertisement Requirements

To Whom it May Concern:

We, the undersigned, are professional campaign treasurers who work for Washington State candidate committees and political committees.

We write in response to the e-mail sent by the PDC on 8/4/2021 which asked, among other things:

“Should campaigns be required to notify commercial advertisers that an order is political advertising, and what should campaigns be required to report to the PDC about the ads they purchase?”

We write in support of leaving the existing rules in place regarding what campaigns are required to report to the public about digital advertisements. We believe this burden of disclosing any additional details is more appropriately placed on the commercial advertisers who profit from the sale of political advertisement.

Requiring treasurers to report additional information on C4s (such as demographics targeted, number of impressions, run dates, etc.) would significantly increase the amount of time and effort that is required for treasurers to file timely, compliant reports for the campaigns we serve. This is because the proposed additional information we would need to disclose is not readily available to us. This information typically does not appear on invoices provided to the campaigns and it can be extremely time consuming for us treasurers to “hunt down” this information. In some instances, this information can be impossible to gather.

Ultimately every new regulation imposed on treasurers by the PDC increases the amount of work we have to perform. The costs of these regulations are reflected in the form of higher fees charged to campaigns we serve.

Rather than having those who participate in the electoral process pay for the cost of these regulations, we feel that the burden of disclosing details about digital advertisements is more appropriately placed on the commercial advertisers, who a) have profited from the sale of political advertisement, and b) possess more complete and accurate records about the precise nature of the service provided than the campaigns possess.

Finally, we appreciate the opportunity to provide comment on these proposed regulations. It is our hope that if the PDC does decide to change the requirements regarding digital ads (or any other requirements relating to what campaigns must report), that they will follow the processes required by the Administrative Procedures Act, which mandates that public notice and opportunities for public feedback be provided. We believe it is extremely important for the PDC to solicit and thoughtfully consider public feedback before changing the legal requirements of what campaigns are required to report.

Sincerely,

Conner Edwards
Campaign Treasurer

Tom Perry
Campaign Treasurer

Jason Michaud
Campaign Treasurer