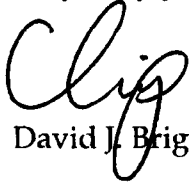


Third, the Committee adopted language to clarify the definition of "de minimis." This clarification addresses IRRC's concerns, while requiring the reporting of the total amount spent. This modification parallels the process used in the Election Code and the regulations promulgated under the authority of that statute. Since Article XVI of the Election Code was a resource used in drafting Act 93, it is logical to conclude that the General Assembly intended a similar construction and application. We are not aware of any intent to the contrary.

Finally, numerous smaller changes were made to clarify points which could have been the source of undue confusion.

Clearly, it would benefit all parties affected by Act 93 if regulations are in place before the August 1 effective date. The revised final-form regulations have been improved considerably, and we respectfully ask IRRC to approve them.

Very truly yours,


David J. Brightbill


Robert J. Mellow


Charles D. Lemmond Jr.