



Professional Fire Fighters of Massachusetts

Affiliated with the International Association of Fire Fighters AFL-CIO CLC

March 14, 2019

Michael Sullivan, Director
Office of Campaign and Political Finance
One Ashburton Place, Suite 411
Boston, MA 02108

RE: Comments in Response to Notice of Proposed Regulation Change

Dear Mr. Sullivan,

The Professional Fire Fighters of Massachusetts (PFFM) appreciates the opportunity to submit comments in response to the recently proposed regulations to better define the appropriate standard for determining when an entity is a “political committee.” We respectfully submit these comments on behalf of our 12,000 members.

The PFFM feels that these proposed regulatory changes would place an undue administrative burden on our local fire union affiliates. In particular, the \$500 limit on contributions by organizations to a PAC has a significant impact on our organization and our affiliate organizations. Local fire unions across the state do not have the resources or administrative staff to properly organized their own PAC once they exceed the incident threshold defined in 970 CMR 1.22(3)(b). These local unions are entirely comprised of public employees and would not legally be able to act as the treasurer of their PAC due to MGL Ch. 55, Section 13, public employee finance law.

The PFFM prides itself on the political action it takes on behalf of our members. Our People's Committee only receives contributions from members of our organization with the no member contributing more than \$9.00 in a calendar year. Our People's Committee filings with OCPF are very transparent listing the contributions from each of our 223 local fire union affiliates.

In conclusion, we urge OCPF to consider the burden that these proposed regulations would place on organizations that exist to advocate for the health and safety of firefighters. We appreciate the opportunity to comment on the draft regulations and are always available to discuss these comments further with OCPF. Thank you for your time and consideration.

Respectfully Submitted,

Rich MacKinnon Jr.
President
Professional Fire Fighters of Massachusetts

Richard MacKinnon Jr.
President

Billy Cabral
Secretary-Treasurer

2 Center Plaza
Suite 4M
Boston, MA 02108

☎ 617.523.4506

☎ 877.470.7336

PFFM.ORG