

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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July 8, 1997
AO-97-13

Georgina W. Scott
55 Broad Street
Salem MA 01970-3138

Re: Republican Party Web Page

Dear Ms. Scott:

This letter is in response to your email received June 6, 1997, requesting an advisory opinion regarding a web page of the Massachusetts Republican Party ("the Party").

Question: May the Party permit all Republican city and town committees or any other Republican organization or candidate to post notices on the Party's web page, and if so, do candidates or committees using the page have to disclose the transaction in campaign finance reports?

Answer: The Party may provide access to the web page to candidates, committees and organizations. Such access is not a "contribution," and therefore it is not subject to the disclosure requirements imposed by the campaign finance law.

Facts: The Party has a web page, "Official Massachusetts Republican Party." Within the Party's web page, there is a calendar of events. The web site for the calendar is "<http://www.massgop.com/calendar.htm>." The calendar may be used to post notices of "meetings, events, activities, etc." Access is provided without charge to all Republican city and town committees and any other Republican organization or candidate.

You have asked whether these Republican organizations and candidates may use the calendar and whether there are any related reporting or disclosure requirements.

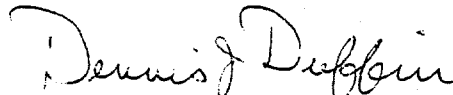
Discussion: This office has previously advised that a candidate committee may use campaign funds to design, implement and maintain a web site or home page. See AO-97-06. The office stated that such expenditures "would appear to be an appropriate method for providing information to constituents." Similarly, a state party committee may also establish a web page. The Party's cost of developing and maintaining the web

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it is completely comprised of private institutions. It is funded exclusively by private funds, and receives no direct or indirect funding from any public institution. The entities which you serve as Executive Director are the private thrift institutions, which cannot be considered to be public instrumentalities.

I therefore conclude that the particular facts concerning The Thrift Fund would not subject its employees to the provisions of the campaign finance law relative to public employees.

Very truly yours,


Dennis J. Duffin
Director

DJD/rep