



October 7, 2019

Dear Members of the Public Campaign Financing Commission,

**As experts on campaign finance policy, we write to request that the Commission issue interim recommendations -- in the form of a bill draft -- publicly by the first full week of November.**

You have a challenging task crafting a public financing system, made even more challenging by your lack of staff support and getting it completed in the 37 working days left. You all have demanding day jobs and virtually no resources to get this complex task completed. Thankfully, New York City offers a successful time-tested model upon which you can scale up a statewide program. Of course, the city system would need to be adjusted for statewide use. As you know, every public financing concept presented to you, as well as previous bills introduced by the Governor and Legislature, agree on these basic points:

- create a permanent program (not a pilot)
- cover primary and general elections
- include at least a 6-to-1 match on small donations for in-state contributions
- significantly reduce contribution limits for participating and non-participating candidates

- place the program and existing campaign finance law under the jurisdiction of an independent enforcement unit
- establish qualifying thresholds low enough to ensure candidates with community support can participate

We appreciated the Commission providing the opportunity for us to share our expertise relatively early in this process. An interim recommendation would allow for comment and analysis on something more specific, helping to ensure a workable final policy. It would help avoid a rush at the end to meet the December 1 deadline -- and would increase public trust in this process and final result.

Thank you for considering our request. We hope you can let us know by the next working session of the Commission, if not sooner, whether an interim recommendation will be released. We remain fully committed to supporting this Commission's efforts to create a public financing system that is a national model. Please let us know how we can help.

Sincerely,

Laura Ladd Bierman, League of Women Voters of New York State  
Betsy Gotbaum, Citizens Union  
Blair Horner, New York Public Interest Research Group (NYPIRG)  
John Kaehny, Reinvent Albany  
Susan Lerner, Common Cause New York  
Lawrence Norden, Brennan Center for Justice