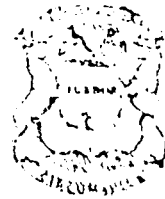


MICHIGAN DEPARTMENT OF STATE

RICHARD H. JUSTIN

SECRETARY OF STATE

STATE TREASURY BUILDING



LANSING
MICHIGAN 1893

October 9, 1978

Mr. Byron A. Williams
BBG&W, Inc.
114 N. Burdick Mall
Kalamazoo, Michigan 49007

Dear Mr. Williams:

This is in response to your request for revision of the identification and disclaimer required for political broadcast advertising pursuant to the Campaign Finance Act, P.A. 388 of 1976, as amended ("the Act").

Section 47 of the Act (MCLA § 169.247), which prescribes the identification and disclaimer requirements for political advertisements including radio and television broadcasts, was amended by the Legislature subsequent to receipt of your letter. The amendatory legislation, P.A. 348 of 1978, amended Section 47 to read as follows (in part):

"(2) A radio or television paid advertisement having reference to an election, a candidate, or ballot question shall identify the sponsoring person as required by the federal communications commission, shall bear the name of the person paying for the advertisement, and shall be in compliance with the following:

(a) If the radio or television paid advertisement relates to a candidate and is an independent expenditure, the advertisement shall contain the following disclaimer: 'Not authorized by any candidate'.

(b) If the radio or television paid advertisement relates to a candidate and is not an independent expenditure but is paid for by a person other than the candidate to which it is related, the advertisement shall contain the following disclaimer:

'Authorized by'
(name of candidate or name of candidate committee)

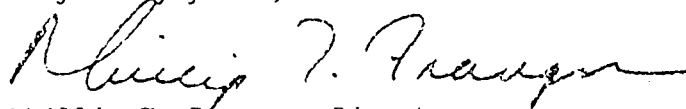
The amended statutory provision is consistent with identification and disclaimer practices existing in the broadcast industry prior to enactment of the Act. The new language resolves the issue raised in your letter.

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Mr. Byron A. Williams
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This response may be considered as informational only and not as constituting a declaratory ruling.

Very truly yours,



Phillip T. Frangos, Director
Office of Hearings and Legislation

PTF:pj