



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Commission Secretary's Office *ileef*

DATE: December 5, 2012

SUBJECT: Comment on Drafts A and B of AO 2012-35
(Global Transaction Services Group, Inc.)

**Attached is a timely submitted comment from
Michael R. Wofford on behalf of Global Transaction Services
Group, Inc.**

Attachment



Global Transaction Services Group, Inc.

Michael R. Wofford
President and CEO
Cell: 402.250.8900
Email: mwofford@GTSGglobal.com

December 5, 2012

Via Fax: Office of Commission Secretary 202.208.3333
Office of General Counsel 202.219.3923

Office of the Commission Secretary
Federal Election Commission
999 E Street, NW
Washington, DC 20463

2012 DEC -5 A 11:30
FEDERAL ELECTION
COMMISSION
SECRETARIAT

Re: Response to AO 2012-35 (Global Transaction Services Group, Inc.) – Draft A and Draft B

To Whom It May Concern:

The following are Global Transaction Services Group, Inc.'s ("GTSG") comments in response to FEC AO 2012-35 (Draft A) and AO 2012-35 (Draft B).

Global Transaction Service Group, Inc. thanks the Commission for their diligent research and sharing their findings and opinions regarding our Advisory Opinion request. Please accept this letter as public record and response. GTSG supports AO 2012-35 (Draft A) and would seek to clarify opinions expressed in document AO 2012-35 (Draft B).

The first point of clarification is the requirement to forward contributor information with the goal to assist the campaign to aggregate contribution totals. GTSG will serve as an aggregator and will act as manager for the transaction between the contributor, the wireless service operators, the credit and debit card companies and the recipient political committees. The immediate data available (at the time of text/donation) for transfer to the campaign is cell phone number, key code, date/time stamp of contribution and donation amount. Additional information available is the email address (if entered) and partial credit or debit card number. GTSG will aggregate by cell phone number and report donations according to requirements in AO 2012-17 which state "The contributor's ten-digit phone number associated with the contribution will be provided to the political committee customer, along with the amount and date of the contribution." Note that the credit/debit card transaction process is 100% PCI compliant, which provides certification that the transaction is running through a highly secure process. As part of PCI compliant regulations, personal card information such as name, address and full card number are not available, per well established bankcard transaction security standards.



Office of Commission Secretary
December 5, 2012
Page 2 of 2

The genesis of this donation process is via text message. It is the use of the text message that will allow limitations and aggregation to occur. The Campaign will receive the donor's mobile number, which in and of itself can be used for aggregation as stated in AO 2012-17. An extended process is available to utilize the mobile number to derive the wireless account information such as the donor's name and address. GTSG would then provide the wireless account information to the campaign for further validation of aggregation compliance.

The second point of clarification revolves around contribution segregation from general treasury funds. GTSG proposes to collect funds by unique keyword and deposit them into separate bank accounts by campaign. No political contributions will be deposited into the general operating fund of GTSG. GTSG will forward all political donations to the appropriate campaign less any processing fees or fees owed for services rendered. All reporting of funds and donors as required by law will be provided in sequence with the dollar amount received.

GTSG also has the operational ability to utilize a campaign's current credit or debit card processing relationship. In those instances, funds would be directly deposited into the campaign's bank account and GTSG would utilize an invoicing system to collect fees. Either way, GTSG fully intends to completely segregate and record all campaign donations separately from GTSG general treasury funds.

In summary, GTSG believes it will meet all FEC regulation requirements to provide mobile credit card donation processing via text messaging. GTSG is committed to providing the highest level of data and reporting integrity in the industry. Furthermore, GTSG seeks to further modernize and develop technology solutions to meet the ever-changing mobile technology needs of the political market landscape.

Thank you for your consideration.

Cordially,

A handwritten signature in black ink, appearing to read "Michael R. Wolford", is written over a printed name. The signature is stylized and somewhat cursive.

Michael R. Wolford

MRW/tb