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May 21, 2013

Mr. Keith Willingham, Director
Combined Federal Campaign
U.S. Office of Personnel Management
Room 6484A
1900 E Street NW
Washington, DC 20415

Ref.: RIN 3206-AM68

Dear Mr. Willingham:

Proposed changes to CFC regulations have caught the attention of non-profit organizations which depend upon the federal campaign to help them to do the work that they do in the world. First, I appreciate the many hours of thoughtful consideration which have gone into producing the proposed changes. It was surely a rigorous debate over issues which contain many variables and no clear-cut answers.

Having invited comment, you are now hearing from many of the thousands of participating charities, large and small. As one of the small ones, I am writing with two points of concern:

1) The move to all-electronic systems, eliminating the print booklet, is a huge change for the program. As a frequent participant in local agency fairs in New York City, I have seen first-hand the value of the print version. I have seen federal workers who use the subway for transportation using their commute time to peruse the booklet. I have seen them poring through the booklet during the agency fairs and finding the booklet essential to their giving decision process. Consideration should be given to phasing in the electronic giving system, perhaps introducing it in a limited geographic area, in order to test it as a pilot run before launching it. Print and electronics could be used concurrently for at least one year—more expense, yes; but less potential loss of donation revenue.

2) My second concern is for the future of the local agency fairs in light of the proposed regionalization. Although Surgeons of Hope is part of a national federation, we are small, so our energies are focused on attending local New York City agency fairs. My experience with local agency fairs has demonstrated the value of face-to-face interaction with federal employees. It helps the participating charities to rise to attention from the pages of fine print in the booklets and to share who we are first-hand with those in attendance. That personalized interaction gets results for us and for the CFC.

Please understand that these comments are offered in the spirit of our shared sincere appreciation for the CFC and our desire to assist in the process of ensuring the program's well-being. Thank you for your efforts in that regard.

Sincerely,

Leila Hawken, Executive Assistant, SoH; CFC Coordinator

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