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December 2, 1998

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Mr. Richard Ng, Report Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

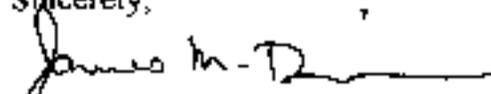
Dear Mr. Ng:

This letter is in reply to your letter to me, dated November 18, 1998 (ID# C00293910), regarding the American Association of Orthodontists PAC (AAOPAC) report for the third quarter of 1998. Your letter raised the question of whether the \$4,000 contribution made by AAOPAC to the Jim Turner for Congress Committee on September 14, 1998, exceeded the limits of the Act in light of a \$2,000 contribution to the same committee by the AAOPAC on November 18, 1996.

As you and I discussed via telephone today, the \$2,000 contribution on November 18, 1996 was a debt retirement contribution, and thus allocated to the 1996 general election. I have confirmed with the committee and with you that the committee did have debt after the November 1996 general election, and thus was eligible for a debt retirement contribution. The committee staff informed me that the contribution was allocated to the 1996 general election in its records.

The AAOPAC report filed in 1996 identified the \$2,000 as disbursed for the general election, which was intended to convey the 1996 general election rather than the next election facing Rep. Turner, which would have been the 1998 primary. We could have made our report clearer by adding "debt retirement" to the purpose of disbursement box, and will do so from now on for such disbursements.

We appreciate your assistance in clarifying this issue and trust that this response resolves any questions you had. Please let me know if you need any further information.

Sincerely,

James M. Drinan
Treasurer

cc: Dr. Peter C. Knudson, Chairman

Federal Election Commission

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