

Massachusetts
Republican Party



Jean Inman
Chairman

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114 State Street • Boston, Massachusetts • 02109

February 21, 1997

Ms. Debbie Manzano
Senior Reports Analyst
Federal Election Commission
999 E Street, N.W.
Room 709
Washington, D.C. 20463

Re: October Quarterly Report (7/1/96-9/30/96)
30 Day Post-General Report (10/17/96-11/25/96)

ID #C00042622

Dear Ms. Manzano:

This letter is in response to your letters dated February 12, 1997 concerning the Massachusetts Republican State Committee's (M.R.S.C.) 9/30/96 and 11/25/96 FEC Reports referenced above.

The Schedule A Supporting Line 12 transfer-in activity from the National Republican Senatorial Committee (N.R.S.C.) and the Republican National Committee (R.N.C.) were not used for Schedule B Supporting Line 21B payments. The transfer-in amounts were used to pay for "Get Out The Vote" mailing expenses for the M.R.S.C. during 1996.

The expenses on Line 21B were paid for with Victory '96 contributions. These contributions were deposited into a separate federal account. These were volunteer-based activities that qualified these expenses.

The Media Services expenditures on H4 were for public relations and consulting services for the M.R.S.C.

Please feel free to contact us if you need further information.

Very truly yours,

WILLIAM B. VERNON
Executive Director

WBV/gmc



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Marguerite J. Clifford, Treasurer
Massachusetts Republican State Committee
114 State Street, 5th Floor
Boston, MA 02109

Identification Number: C00042622

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Ms. Clifford:

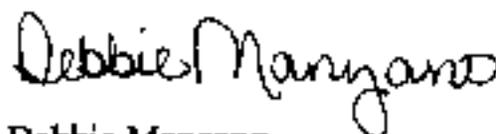
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 12 discloses a transfer-in from the National Republican Senatorial Committee and the Republican National Committee. Schedule B supporting Line 21(b) reflects payments for exempt activity. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.7(b)(15) and (17) and Pages 14 and 15 of the Campaign Guide for Party Committees.

Please clarify the nature of the transfers-in and subsequent payments for the exempt activity. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Debbie Manzano
Senior Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

FEB 12 1997

Marguerite J. Clifford, Treasurer
Massachusetts Republican State Committee
114 State Street, 5th Floor
Boston, MA 02109

Identification Number: C00042622

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Ms. Clifford:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

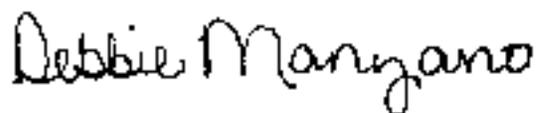
-Schedule A supporting Line 12 discloses a transfer-in from the National Republican Senatorial Committee and the Republican National Committee. Schedule B supporting Line 21(b) reflects payments for exempt activity. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.7(b)(15) and (17) and Pages 14 and 15 of the Campaign Guide for Party Committees.

Please clarify the nature of the transfers-in and subsequent payments for the exempt activity. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-Please clarify all expenditures made for media services on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Debbie Manzano
Senior Reports Analyst
Reports Analysis Division

Federal Election Commission
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The Commission has added this page to the end of this filing to indicate how it was received.

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JES
PREPARER

2-27-97
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