

February 4, 2009

Ms. Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Pulte Homes Inc. Political Action Committee (PULTEPAC)
FEC ID C00436576
12 Day Pre-General Report (10/01/08-10/15/08)

Dear Ms. Lewis:

I am writing in response to your letter dated January 9, 2009 regarding the above-referenced report filed by the Pulte Homes Inc. Political Action Committee (PULTEPAC). Specifically, your letter states the committee may have satisfied the criteria set forth at 11 CFR 100.5(e)(3) for becoming a multicandidate committee; however, the Commission has no record of a Form 1M filed by the committee.

To date, the committee has not satisfied the requirements for becoming a multicandidate committee, as the committee has not received contributions for federal elections from at least 51 persons since inception. Therefore, a Form 1M has not been submitted.

Please let us know if any further information is needed.

Sincerely,

Kenneth Gear, Treasurer
Pulte Homes Inc. Political Action Committee (PULTEPAC)
10600 Arrowhead Drive, Suite 225
Fairfax, VA 22030
