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Employee Federal Political Action Committee

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June 12, 2001

Ms. Antoinette Kitchen
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00109017

Reference: Letter regarding SBC EmPAC 30 Day Post-General Report
(10/19/00-11/27/00)

Dear Ms. Kitchen:

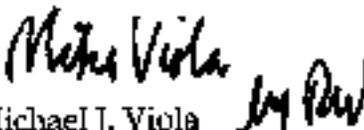
This is in response to your June 1, 2001 letter (the "Correspondence") in which you raised questions concerning information contained in the Schedule B supporting Line 23 of the SBC EmPAC 30 Day Post-General Report (10/19/00 - 11/27/00) disclosing contributions to various "leadership" PACs. The purpose of the disbursement for these contributions listed a federal candidate's name and you indicated it was unclear as to who was the ultimate recipient of these contributions.

Angela Hanratty, Manager-Federal EMPAC, stated that she spoke with you on June 8th, 2001 to offer clarification of your questions raised in the Correspondence. I understand that Ms. Hanratty correctly informed you that the PAC software used to file our monthly FEC Reports automatically generated the information in question. Apparently this disbursement information has been reported in the same manner for the past two years and we were unaware that it was an issue of concern to the FEC. Ms. Hanratty relayed to me that it is her understanding based on her conversation with you that no report amendments need to be filed and that we agreed that our PAC software will be modified to comply with your request that the federal candidate name associated with "leadership" PAC disbursements is not reported on future FEC filings. Further, she indicated that it is her understanding based on that conversation that since the matter was discussed and the resolution agreed upon, any further correspondence from the FEC pertaining to this issue for filings prior to your conversation can and should be disregarded. It is also her understanding that you asked us to confirm the foregoing results of this June 8th conversation in writing, noting the issues that you raised in the

Correspondence and the action to be taken by SBC EmPAC going forward, which is the purpose of this letter.

Please let me know if you require further information or have additional questions.

Sincerely,


Michael J. Viola
Treasurer, SBC EmPAC

Federal Election Commission

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