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To Whom It May Concern: I am writing in response to the FEC 7/30/12 letter suggesting the American Action network's independent expenditures that it disclosed on 24 hour notices should have been disclosed a second time on a subsequent July Quarterly report. when we previously received a similar letter, we responded on 3/13/12 by explaining that relevant FEC guidance does not require redundant disclosures of independent expenditures on quarterly reports by organizations, like the American Action Network, that are not political committees and have already disclosed the independent expenditures on 24 or 48 hour notices. We interpret from the fact that we received a second letter that you do not agree with our position.

While we continue to maintain that the FEC's publicly available guidance at http://www.fec.gov/brochures/ie_brochures.pdf indicates that quarterly reporting by the American Action Network of previously disclosed independent expenditures is not required, we have nonetheless filed the July Quarterly Report and will begin filing reports for calendar quarters in which the American Action Network makes independent expenditures.
