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Charles A. Neale
Vice President and General Counsel

March 28, 2002

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E. Street, NW Room # 709
Washington, D.C. 20463

IDENTIFICATION NUMBER: C00095786

*NATIONAL BANK OF COMMERCE COMMITTEE ON
POLITICAL AFFAIRS*

REFERENCE: YEAR-END REPORT (10-01-2001 - 12-31-2001)

Dear Mr. Gibson,

This is to acknowledge receipt of your *MailGram* dated 3-8-02 which I received 3-11-02.

The above referenced year-end report was forwarded to your office via FedEx on 3-14-02.

Unfortunately, this is not the only time the *National Bank of Commerce Committee on Political Affairs (NBC COPA)* has failed to file a timely report. Our quarterly report due 4-15-01 was sent on 4-26-01 and our quarterly report due 7-11-01 was sent on 8-2-01.

As Secretary/Treasurer of the *NBC COPA*, I fully acknowledge that it is my personal responsibility to see that quarterly reports are filed accurately and on a timely basis. I would, however, respectfully ask that you take the following into consideration:

- the *NBC COPA* was formed in May 1978. Until her retirement in June 2000, our Assistant Secretary/Treasurer, Ms. Martha Gates, prepared and filed our FEC quarterly reports in a competent manner and on a timely basis;
- in July 2000, National Commerce Bancorporation, the parent company of National Bank of Commerce, merged with another bank holding company, CCB Financial Corporation, which resulted in the retirement, resignation, termination or reassignment of many employees;

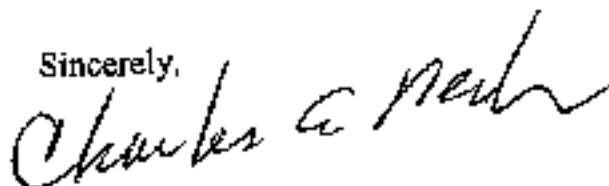
- from June 2000 through March 2002, four different employees have been assigned to assist me in the preparation of our FEC and State filings;
- we recently appointed Ms. Cheryl Doo, a four year employee with an accounting background, to the position of Assistant Secretary/Treasurer responsible for filing FEC and State reports.

I fully acknowledge that it is my responsibility to accurately and timely file reports with the Federal Election Commission. I believe we did so for well over twenty years, but events over the past eighteen (18) months significantly contributed to the late filings set forth above.

We believe the appointment of Ms. Doo is an important step in the right direction.

Thank you for the opportunity to respond and for your consideration.

Sincerely,



Charles A. Neale

CAN/ckc 3-28-02

cc: Gus B. Denton, Chair, *NBC COPA*
Cheryl Doo, Assistant Secretary/Treasurer

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

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

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