

Whirlpool Corporation did not receive the request from the FEC for further information postmarked March 07, 2007 until June 29, 2007. The letter arrived with several other pieces of mail all postmarked on March 07, 2007.

Whirlpool Corporation has historically used software from Gnosso which was bought by Vocus to file electronic reports with the FEC. In 2006, Vocus notified Whirlpool that the old software would no longer be supported at the end of Whirlpool's contract on 11/01/2006. This notice along with an corporation-wide change in computer platforms to Windows XP from Windows 98 necessitated a move to the FEC's filing software starting with the 12 Day Pre-General Report (10/01/06 - 10/18/06).

In investigating the FEC's request for information, Whirlpool discovered that the Vocus software was improperly itemizing employee payroll contributions prior to an individual's meeting the FEC \$200 threshold for itemization on line 11a of committee receipts. In order to see an example of this error, please refer to page six of the original April 15th quarterly report. This report covers employee payroll contributions for the months of January, February, and March. The Committee received six bi-monthly payroll contributions from each employee during this period.

On page six, a payroll deduction for John Anderson is listed in Box A. for \$150.00 on 01/15/2006. The aggregate year-to-date is \$150.00 for this employee as of 01/15/06. This contribution should not be listed on Schedule A and the \$150 contribution should not be recorded for summation on line 11a as the contributor has not reached the \$200 FEC threshold as of 01/15/2006.

The employee's payroll deduction on 01/31/06 of \$150.00 results in an aggregate year-to-date of \$300.00 which would now require the itemization of the \$150.00 receipt on line 11a. The amended April 15th quarterly report does not contain this error as seen on page six of the amended report.

In order to comply with the Committee's request, Whirlpool has amended all of the 2006 reports using the FEC's filing software to correctly allocate employee payroll contributions on lines 11a and 11b. There are no changes to the total amount of employee payroll receipts or to the amounts of WCPAC contributions to political candidates. Additionally, there is no change in the disclosure of Whirlpool employee names who contribute more than \$200 a year to the company's political action committee.

Sincerely,

Sean Mackay  
WCPAC Treasurer