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Robin Kelly
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Kelly,
The purpose of this letter is to respond to your letter dated July 17, 2013 regarding the October Quarterly Report (7/01/12-9/30/12) of American Action Network Inc.

All 48-hour reports were filed in a timely manner. As noted in your letter, Schedule E of this report and the relevant 48-hour reports list payment dates for independent expenditures, not dissemination dates. The dissemination date of each independent expenditure is listed below per your request.

Your letter also inquires about the reporting of contributions to American Action Network Inc. and suggests that the October Quarterly Report include this information. The Commission's regulations require the disclosure of contributions only when a ?contribution was made for the purpose of furthering the reported independent expenditure.? 11 C.F.R. 109.10(e)(1)(vi). American Action Network Inc. had no such contributions, therefore, no contribution disclosure was required and no amendment of its October Quarterly Report is necessary. If American Action Network Inc. receives contributions that are subject to these requirements, those contributions will be reported. For purposes of future reports, the omission of contribution information should not be assumed to be an oversight. Your letter also cites 11 C.F.R. 114.10(f) which applies to solicitations made by qualified nonprofit corporations, however, the American Action Network Inc. is not a qualified nonprofit corporation. Therefore, 11 C.F.R. 114.10(f) is inapposite.

Sincerely,
Stephanie Fenjiro

American Action Network Inc. (C90011230)
October Quarterly Report (7/1/12-9/30/12)
48 hour Notices

American Media & Advocacy Group - Paid 9/11/2012 ? Amount \$475,184.40
Purpose: Neighbors TV Purchase
Candidate: Jose Hernandez
Filed: 9/18/12
Dissemination Date: 9/17/2012

Targeted Victory ? Paid: 9/14/2012 ? Amount: \$28,999.00
Purpose: Digital Advertising & Website
Candidate: Jose Hernandez
Filed: 9/18/12
Dissemination Date: 9/17/2012

American Media & Advocacy Group - Paid: 9/11/2012 ? Amount: \$139,798.80
Purpose: First Placement TV Purchase
Candidate: David Gill
Filed: 9/15/12
Dissemination Date: 9/14/2012

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American Media & Advocacy Group - Paid: 9/18/2012 ? Amount: \$141,363.20
Purpose: First TV Placement
Candidate: David Gill
Filed: 9/22/12
Dissemination Date: 9/21/2012

Upgrade Films - Paid: 9/12/2012 ? Amount: \$14,936.74
Purpose: Good TV Placement
Candidate: David Crooks
Filed: 9/22/12
Dissemination Date: 9/21/2012

Targeted Victory ? Paid: 9/14/2012 ? Amount: \$28,999.00
Purpose: Digital Media Advertising & Website
Candidate: David Crooks
Filed: 9/22/12
Dissemination Date: 9/21/2012

American Media & Advocacy Group - Paid: 9/18/2012 ? Amount:\$43,802.00
Purpose: Good TV Placement
Candidate: David Crooks
Filed: 9/22/12
Dissemination Date: 9/21/2012

American Media & Advocacy Group - Paid: 9/26/2012 ? Amount: \$26,602.40
Purpose: TV Placement
Candidate: David Crooks
Filed: 9/29/12
Dissemination Date: 9/28/2012

American Media & Advocacy Group - Paid: 9/11/2012 ? Amount: \$188,146.00
Purpose: TV Placement
Candidate: Richard Nolan
Filed: 9/15/12
Dissemination Date: 9/14/2012

American Media & Advocacy Group - Paid: 9/11/2012 ? Amount: \$35,650.80
Purpose: Side TV Placement Purchase
Candidate: Richard Nolan
Filed: 9/18/12
Dissemination Date: 9/17/2012

Upgrade Films - Paid: 9/13/2012 ? Amount: \$14,964.18
Purpose: Side Production
Candidate: Richard Nolan
Filed: 9/18/12
Dissemination Date: 9/17/2012

Targeted Victory ? Paid: 9/14/2012 ? Amount: \$28,999.00

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Purpose: Digital Advertising & Website
Candidate: Richard Nolan
Filed: 9/18/12
Dissemination Date: 9/17/2012

American Media & Advocacy Group - Paid: 9/18/2012 ? Amount: \$189,882.00
Purpose: TV Placement
Candidate: Richard Nolan
Filed: 9/22/12
Dissemination Date: 9/21/2012

American Media & Advocacy Group - Paid: 9/18/2012 ? Amount: \$35,600.40
Purpose: TV Purchase Placement
Candidate: Richard Nolan
Filed: 9/25/12
Dissemination Date: 9/24/2012

American Media & Advocacy Group - Paid: 9/26/2012 ? Amount: \$37,298.80
Purpose: TV Placement
Candidate: Richard Nolan
Filed: 9/29/12
Dissemination Date: 9/28/2012