



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

C. Edward Jordan, Jr., Treasurer
Commerce Bancorp Inc. - Political
Action Committee FED
1701 Route 70 East
Cherry Hill, NJ 08034

JAN 6 1999

Identification Number: C00303156

Reference: October Quarterly Report (7/01/98-9/30/98)

Dear Mr. Jordan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B disclosed two loans in the amount of \$20,000 a piece made on 7/21/98 and 9/21/98, totaling \$40,000, to Compac, NJ. Schedule A disclosed a loan payment received from Compac, NJ on 8/25/98 of \$20,163.01. According to 11 CFR §100.7(a)(1)(i)(E), any loan made by a political committee is subject to the limitations outlined in 11 CFR part 110. While repayment of the principal amount of such a loan is not considered a contribution by the debtor to the lender committee, the repayments must be comprised of permissible funds subject to the prohibitions of 11 CFR §110.4(a) and Part 114. Please clarify whether all repayments received previously and all repayments received in the future are comprised of permissible funds.

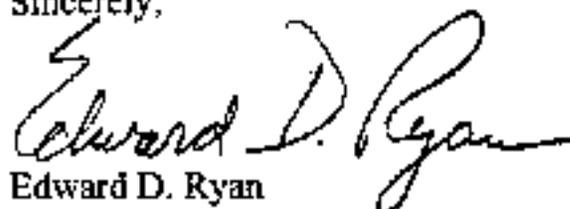
-Please provide the totals for Lines 11(a)(i), 11(a)(iii), and 11(d), Column B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-Your calculations for Lines 11(a)(i), Column B through 20, Column B appear to be incorrect. FEC calculations disclose this amount to be \$58,232.87. Please provide the corrected totals on the Detailed Summary Page.

-The Summary Page discloses \$58,232.87 on Line 6(c), Column B, but the Detailed Summary Page shows the Line 20, Column B total to be \$25,232.87. These figures should be the same. Please amend your report accordingly.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Edward D. Ryan

Reports Analyst

Reports Analysis Division

