



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

May 18, 2000

Sheila Mahony, Treasurer
Cablevision Systems Corporation
Political Action Committee
111 Stewart Avenue
Bethpage, NY 11714

Identification Number: C00197863

Reference: Year End Report (7/1/99-12/31/99)

Dear Ms. Mahony:

This letter is to inform you that as of May 17, 2000, the Commission has not received your response to our request for additional information, dated April 26, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your Amended April Quarterly Report dated April 27, 2000; however, it does not address the matters in the letter referenced above. If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Andrew J. Dodson on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Sheila Mahony, Treasurer
Cablevision Systems Corporation
Political Action Committee
111 Stewart Avenue
Bethpage, NY 11714

Identification Number: C00197863

APR 26 2000

Reference: Year End Report (7/1/99-12/31/99)

Dear Ms. Mahony:

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:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period for each contributor. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Please amend Schedule B supporting Line 23 by providing the office sought including state and congressional district, if applicable, for each contribution made to a federal candidate or political committee. 11 CFR §104.3(b)(3)(ii) and (v)

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

-Your report includes computer produced formats of Schedules A and B. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

If the software your committee is using to produce the Schedules of the FEC FORM 3X does not allow you to electronically file your report, you may want to call the vendor who produced your software to inquire about the availability of a software upgrade that includes electronic filing. A number of commercial software companies have added electronic filing capability to their products. A list of these companies is available on the FEC web site, <http://www.fec.gov>.

Alternatively, freeware (FECfile) available from the FEC, can help you complete and file your reports electronically. It installs easily, computerizes every schedule in the FEC FORM 3X, contains features to help you avoid common errors, allows you to file electronically, and has free technical support for your questions. You may obtain your free copy by downloading FECfile from our web site, <http://www.fec.gov>, or by calling the Electronic Filing Office at (202) 694-1307.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate spreadsheet for each category of the Detailed Summary Page	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(a)(1)		
Any information copied from such Receipts and Statements may not be used or cited by any person for the purpose of obtaining contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such contributors.						
NAME OF COMMITTEE (in full) National Organization PAC 00000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (in Dollars)	
Anne Sullivan 81 12th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$90.00	
Reason for: <input type="checkbox"/> Charitable <input type="checkbox"/> Political <input type="checkbox"/> Other		Occupation Branch Manager		Aggregate Year-to-Date > 1	(\$15 biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (in Dollars)	
Rodney Jones 881 Hainsbury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$180.00	
Reason for: <input type="checkbox"/> Charitable <input type="checkbox"/> Political <input type="checkbox"/> Other		Occupation Vice President		Aggregate Year-to-Date > 5	(\$80 biweekly)	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate spreadsheet for each category of the Detailed Summary Page	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(a)(1)		
Any information copied from such Receipts and Statements may not be used or cited by any person for the purpose of obtaining contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such contributors.						
NAME OF COMMITTEE (in full) National Organization PAC 00000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (in Dollars)	
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.		8/18/84	\$3,898.00 (IN-KIND) (RAFFLE PRIZE)	
Reason for: <input type="checkbox"/> Charitable <input type="checkbox"/> Political <input type="checkbox"/> Other		Occupation Chairman		Aggregate Year-to-Date > 3	3,898.00	

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate spreadsheet for each category of the Detailed Summary Page	PAGE	OF
Operating Expenditures/Other Federal				FOR LINE NUMBER 21(b)		
Any information copied from such Receipts and Statements may not be used or cited by any person for the purpose of obtaining contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such contributors.						
NAME OF COMMITTEE (in full) National Organization PAC 00000001						
A. Full Name, Mailing Address and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement (in Dollars)	
Martin L. Kress 4 River Road City, State ZIP		raffle prize		8/18/84	\$3,898.00 (IN-KIND CONTRIBUTION)	
Reason for: <input type="checkbox"/> Charitable <input type="checkbox"/> Political <input type="checkbox"/> Other		Occurrence of: (Month, Day, Year)				

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$80), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page B for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

