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July 12, 2000

Ms. Antoinette Kitchen
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. - 20463

Re: Glaxo Wellcome Inc. PAC
FEC ID# C00199703
April Monthly Report

Dear Ms. Kitchen:

This is in response to your June 16, 2000 letter to Mitchell Kane, Treasurer of the Glaxo Wellcome Inc. PAC, regarding the manner in which payroll deductions are reported on Schedule A of the PAC's FEC Report. Public Affairs Support Services, Inc. (PASS) provides assistance to Glaxo Wellcome Inc. and prepares the FEC reports for the above referenced PAC.

Your letter and subsequent conversation with Stephanie Neill of PASS indicate that there may be some confusion in the way you are interpreting the PAC's Schedule A supporting Line 11(a)(i). The PAC does not itemize its payroll receipts using the suggested method in your letter for the following reasons:

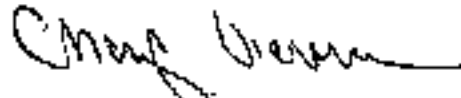
1. The amount each individual contributes per pay period is based on a percentage of pay and can change frequently due to pay increases or voluntary changes in the contributor's deduction. It would be impossible to display an aggregate amount for the reporting period and then show the amount deducted per payroll period. Such a method would result in an "average" per pay period, not an actual amount per pay period, which would be incorrect. Further, these averages could be fractions of a cent which is also impossible under our nation's currency system.
2. Some of the PAC's payroll deduction participants are paid monthly while others are paid semi-monthly. Thus, the payroll periods are different and would not conform to a general payroll period description.

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Because of the above reasons, it is not practical or feasible to report Line 11(a)(i) receipts in the manner suggested in your letter. Therefore, to be in full compliance with the requirements of the Federal Election Campaign Act, the PAC discloses the full name, address, occupation and employer of each contributor, the date of each payroll contribution and the amount of each payroll contribution. For further clarification, the schedule notes whether the contribution was made via payroll deduction or a personal check. The aggregate year-to-date total of the contributions of each PAC participant is also disclosed. This method has been used by the Glaxo Wellcome Inc. PAC for well over a decade.

I hope this explanation clarifies the methodology used by the Glaxo Wellcome Inc. PAC in disclosing its receipts. Please keep this letter on file for future reference when you are reviewing the PAC's reports. If you have any questions or need any additional information, please feel free to call Stephanie Neill or me.

Sincerely,




Cheryl Vienna
President

cc: Mitchell Kane, Treasurer
Glaxo Wellcome Inc. PAC

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
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