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September 26, 2011

Federal Election Commission  
Reports Analysis Division  
Attn: Mrs. Marlene D. Colucci  
999 E Street, NW  
Washington, DC 20463

ID#C00053553  
RE:March Monthly Report (02/01/2011 02/28/2011)

Dear Mrs. Colucci,

A review of the above referenced report raised four questions concerning (1) employment information for Schedule A, (2) outstanding debts not shown on Schedule D, (3) public dissemination dates for Schedule E, and (4) negative entries for line 24 of Schedule E.

Item one (1) concerns the identification of each contributors employment information whose yearly contribution exceeds \$200.00.

Our three-fold process in obtaining employment information is as follows:

First, our original solicitation includes a clear and conspicuous request for the contributor information and informs the contributor of the requirements of federal law for reporting such information.

Second, individuals whose contributions exceed the \$200 threshold and did not provide the required information are sent a letter, within 30 days of receipt of the contribution, asking for the missing information, without soliciting a contribution; informs the contributor of the requirements of federal law for the reporting of such information, and includes a pre-addressed envelope.

Third, for any information received after the contribution has been reported, an amended report is filed on or before the next monthly filing.

Item two (2) concerns an outstanding debt for OnMessage, Inc. The original report did not report the outstanding balance or the payment for the debt that was made during the reporting period. An amended report dated August 25, 2011 reports this transaction on Schedule D, Line 9.

Item three (3) relates to public dissemination of a communication and when the payment is made. Three candidates were listed. A television advertisement endorsing Joseph Sestak was disseminated on October 18, 2010 and reported within 24 hours on October 19, 2010. A radio ad that endorsed Ken Buck and opposed Michael Bennett was disseminated on October 25, 2010 and reported to the FEC on October 26, 2010. The vendor, OnMessage, Inc. did not invoice us for the production cost of these media buys but we did report estimated cost. OnMessage, Inc. held the invoices and used excess production cost previously paid as a credit to these expenditures. Final resolution did not happen until February 28, 2011.

Item four (4) regards negative entries shown on Schedule E, Line 24. The entries in question are from a single transaction consisting of credits of previous paid and reported media production cost plus additional production cost that had not been invoiced.

Pre-Paid Production	(155,833.36)
Actual Production Used	84,710.35
Credit Production not used	(71,123.03)
Additional Production Cost	25,976.23
Additional Media	30,079.69
Remaining Credit not used	(15,067.11)

The Pre-Paid Production amount was paid on September 30, 2010 and later reported for six candidates as their media was disseminated. The production credit needed to be reported for the same six candidates to reflect the actual production cost

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A does not allow allocation. Reporting the payment of remaining credit not used on Schedule E allowed us to report a clear and accurate cost associated to each candidate involved in the transaction.

If you have any further questions, I can be reached at 703-267-1155.

Sincerely,

Mary Rose Adkins  
Treasurer

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