

February 13, 2011

Mr. Allen Norfleet  
Reports Analysis Division  
Federal Election Commission

Identification Number: C00417733

RE: 12 Day Pre-general Report (10/01/10 - 10/13/10)

Dear Mr. Norfleet:

This submission is in response to your review of the above referenced report:

1. The report, and subsequent reports filed for 2010, are amended to include Schedule H-1. The allocation percent for administrative expenses remained at 50% for the calendar year.
2. The disbursement for 'Internet Advertising' was for internet search engine ads for the purpose of promoting the Committee's website which provides information about Democrats for Education Reform and the policies and issues the organization advocates. As indicated in the report, the search engine ads do not identify or advocate for or against any federal candidate. The ads are not public communications as defined by the Commission's regulations at 11 CFR Sec. 100.26, are not voter drive activity, and do not contain express advocacy. The advertising is administrative rather than electoral in nature and the costs are appropriately paid with federal and nonfederal funds and disclosed on Schedule H-4 as an administrative expense.

Sincerely,

Joe Williams  
Treasurer

Treasurer

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