

RECEIVED
FEDERAL ELECTION
COMMISSION
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SECTION

2007 AUG 21 P 12:43

Karen E. Andrew
Manager - Finance Ops.
AP, Corp Card & PAC Admin

771 Parkway Ave
Ewing, NJ 08618
Phone 609 406-7153
Fax 609 406-7171
karen.e.andrew@verizon.com



8/18/07

Enclosed is a response
to a Request for
Additional Inform-
ation letter. Also
included is the
letter and a check
copy noting the
intended election.
There are (6)
pages in total.

27039512160



771 Parkway Ave
Ewing, New Jersey 08618

RECEIVED
FEC MAIL CENTER

2007 AUG 21 AM 11:38

August 18, 2007

Sylvette Seay
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Seay:

I am writing in response to your letter of July 25, 2007, which requested information regarding several items in the 2006 Amended April Quarterly Report of the Verizon Communications Inc. Good Government Club ("Verizon PAC").

Item 1 of the July 25, 2007 letter identifies a discrepancy between the cash on hand at the end of the reporting period and the year-to-date cash on hand amount. This was incorrectly reported, and we will be amending the report to reflect the true calendar year-to-date amounts for that period. This discrepancy was the result of user error with respect to the software used for processing the report. We will review these entries more closely prior to submitting reports in the future.

Item 2 in your letter identifies contributions to John D. Dingell for Congress Committee, which, in your opinion, appeared to exceed applicable contribution limits. Two of the contributions listed in your letter were made by the MCI PAC prior to its affiliation with the Verizon PAC. However, it appears that you have counted towards the applicable limits contributions made by the MCI LLC Employees Political Action Committee ("MCI PAC") prior to the date it became affiliated with the Verizon PAC. The Verizon PAC (C00186288) and MCI PAC (C00142836) became affiliated in January 2006. Contributions made by affiliated PACs prior to the date of their affiliation are not subject to a shared aggregate limit. See Advisory Opinion 1985-27. Therefore, as you and I discussed in our telephone conversation of August 9, 2007, the contributions cited in your letter are in fact permissible. However, even when the MCI PAC contributions are excluded, the report makes it appear that the Verizon PAC's contributions to the candidate still exceed the applicable limits. This is due to a mistake in reporting the March 15, 2006, contribution to Dingell for Congress. This check was reported as having been made to the 2006 primary election, when in fact it was made for the 2006 general election. We will be processing an amendment to the April Quarterly Report to reflect the correct election period for this contribution. In an effort to avoid similar problems in the future, we are adding an additional review to our disbursal process to help ensure that contributions are being attributed to the correct elections. We are also exploring improvements to the software used to manage our contribution process which would help prevent this type of mistake from being made in the future.

Item 3 in your letter identifies a contribution to a candidate (Hatch Election Committee Inc.) that appeared to exceed applicable contribution limits. The contributions made by the MCI PAC prior to its affiliation with the Verizon PAC do count towards applicable limits when determining whether those PACs may make contributions after the date of affiliation. The March 29, 2006, contribution to the Hatch Election Committee was made after the date of affiliation, and would therefore be considered excessive. While your letter refers to the March 29, 2006, contribution as a refund, it should be noted that it was never deposited by the Hatch Election Committee, and was voided. Therefore, no further action is necessary with respect to this contribution. As noted in the previous paragraph, we are exploring improvements to the software and process used to manage our contribution process which should help avoid situations like this in the future..

If you have any questions about this matter, please contact me at 609-406-7153.

Sincerely,

Karen Andrew
Assistant Treasurer

27039512161



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 25, 2007

Joan Simpson, Treasurer
Verizon Communication Inc.
Good Govt Club
771 Parkway Ave
Ewing, NJ 08618

Response Due Date:
August 24, 2007

Identification Number: C00186288

Reference: Amended April Quarterly Report (1/1/06-3/31/06), received 12/4/06

Dear Ms. Simpson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

Item ①

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

Item ②

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

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If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Item 3 - Schedule B of your report (see attached) discloses an apparent excessive contribution(s) made to a federal candidate(s). The Act prohibits a multi-candidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election. 2 U.S.C. §441a(a)

The Commission notes the receipt of refund of the excessive contribution(s) on your Amended October Quarterly Report (7/1/06-9/30/06), received 12/4/06. Although the Commission may take further legal action concerning the excessive contribution(s), your prompt action in obtaining a refund or redesignating the contribution(s) will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1393.

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VERIZON COMMUNICATION INC. GOOD GOVT CLUB

Page 3

Sincerely,

A handwritten signature in cursive script, appearing to read "Sylvette Seay".

Sylvette Seay

Campaign Finance Analyst
Reports Analysis Division

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VERIZON COMMUNICATION INC. GOOD GOVT CLUB

Page 4

Excessive Contribution to a Candidate/Committee with an Affiliated Committee

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
John D. Dingell for Congress	3/1/05	\$1,000	P-2006	2005 April Monthly	C001428396
John D. Dingell for Congress	6/7/05	\$1,000	P-2006	2005 Mid-Year	C00363127
John D. Dingell for Congress	9/13/05	\$1,000	P-2006	2005 October Monthly	C00142836
John D. Dingell for Congress	10/13/05	\$2,000	P-2006	2005 Year End	C00186288
John D. Dingell for Congress	12/8/05	\$1,000	P-2006	2005 Year End	C00186288
John D. Dingell for Congress	3/15/06	\$2,000	P-2006	2006 April Quarterly	C00186288

Excessive Contribution to a Candidate/Committee with an Affiliated Committee With a Void

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Hatch Election Committee Inc.	11/22/04	\$1,000	P-2006	2004 30-Day Post-General	C00186288
Hatch Election Committee Inc.	3/29/05	\$3,000	P-2006	2005 Mid-Year	C00186288
Hatch Election Committee Inc.	4/19/05	\$1,000	P-2006	2005 May Monthly	C00142836
Hatch Election Committee Inc.	12/19/05	\$1,000	P-2006	2005 Year End	C00142836
Hatch Election Committee Inc.	3/29/06	\$1,000	P-2006	2006 April Quarterly	C00186288
Hatch Election Committee Inc.	9/30/06	-\$1,000	P-2006	2006 October Quarterly	C00186288

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031000040
07/05/2006
6210966444

This is a LEGAL COPY of
your check. You can use it
the same way you would
use the original check.

✓

✓

AM 11-2006

PAID Two thousand dollars and 00 cents

TO THE ORDER OF John D. Dingell For Congress Committee
607 14th Street NW, Suite 800
Washington, DC 20005

111271932785 870396
03/15/2006

AMOUNT \$2,000.00

WACHOVIA BANK, N.A.
PHILADELPHIA, PENNSYLVANIA

16230; Contribution General 2006

1000001000007

011 111271932785 870396 201-242-2427 0000000044732307
07031003 07/05/2006 15 25N60 7343 7343
031000040* FRB-PHILA
ENT 031000040* FC=1294 PK=2A
000-0000 TRC=0026 PK=01
03120733
COLLECTING BANK 31297
SNC-752 07052006 62PK
0623227948

052000276 07/05/2006
0726170476
053000025 07/05/2006
6235102343
031000040 07/05/2006
6210966444

Do not endorse or write below this line.

Item is noted for General 2006
(related to item 2 in letter)

Item Amount	Item Serial	Item R/T	Item Account	Item Sequence	Item Capture Date
\$2,000.00	8444	3100050	2030000118258	623227948	07-05-2006

Wachovia Bank, N.A. certifies that the above image is a true and exact copy of
the original item issued by the named customer, and was produced from original
data stored in the archives of Wachovia Bank, N.A. or its predecessors.

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
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<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
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Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>UPS</i>	Shipping Date <i>8/20/17</i>
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>Jeff</i> PREPARER	<i>8/21/17</i> DATE PREPARED

(3/2005)

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