

February 17, 2011

Ms. Maureen Benitz  
Reports Analysis Division  
Federal Election Commission

BY ELECTRONIC SUBMISSION

Identification Number: C00387555

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

Dear Ms. Benitz:

This submission is in response to your review of earmarked contributions disclosed on the above referenced report.

The Committee was unable to forward timely some contributions received via credit card transaction over the internet due to two circumstances that were unusual and beyond the Committee's control, the timing of the calendar days and the federal Columbus Day banking holiday, and the untimely absence of the staff member who coordinated the processing and reconciliation of these contributions due to personal reasons.

Pursuant to previous instruction from the Reports Analysis Division, the date of receipt for each contribution is the day that the contributor authorizes and submits the contribution via the internet. As a common industry practice for an organization with the volume of activity, and a political committee who cannot accept credit from an incorporated vendor, there is a delay, usually two to three days, in the funds being posted to the Committee's bank account and available for distribution to the designated authorized committees. Apparently due to the Columbus Day holiday, many of the contributions received during the period from Tuesday, October 5, 2010 through Friday, October 8, 2010 were not deposited into the Committee's bank account until Wednesday, October 13, 2010, leaving only two days in this ten day period to reconcile and forward the contributions by the cut-off time on the last banking day of that week, Friday, October 15, 2010. The reconciliation and verification processing was managed accurately, though slower than normal since the primary coordinator was not in the office. Therefore, due to the weekend, many of the contributions received on the internet from October 5th through October 8th did not actually leave the Committee's bank account until the following Monday, October 18th and Tuesday, October 19th. All contributions were forwarded well within ten days of the funds being available to the Committee to transmit.

The Committee notes that it has set in place comprehensive procedures to reconcile, verify and transmit earmarked contributions within ten days or less. These procedures were designed and implemented in 2007. Since that time the Committee has processed approximately 30,000 earmarked contributions, and this is the only incident of a contributions being forwarded outside of the ten day period. During this period in October 2010, the Committee processed over 3,000 contributions and only a very small percentage, approximately 275 contributions, were forwarded outside of the ten day period from the date the contributors submitted the authorizations, primarily due to the delay in the funds being available for transfer over the Columbus Day holiday weekend.

Sincerely,

John D. Isaacs  
Treasurer

Treasurer

\*\*\*\*\*

\*\*\*\*\*