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March 17, 2011

2011 MAR 18 AM 11:46
FEC MAIL CENTER

Maureen Benitz
Federal Election Commission
Senior Campaign Finance Analyst & Reviewing Analyst
Reports Analysis Division
Washington, D.C. 20463

Re: Viacom International, Inc. Political Action Committee
FEC # C00167759

Dear Maureen:

This letter is being sent in response to your letter dated March 15th, 2011 regarding the Year End Report (11/23/2010 – 12/31/2010) for the Viacom International, Inc. Political Action Committee.

Per the request in your letter please find the copies of the six refund checks issued to the following individuals: Michael Fricklas, Loretha Jones, Debra Lee, Judith McGrath, William Roedy & Andra Shapiro who exceeded the 2010 contribution limit.

As stated on our Year End Report we will be reflecting the above mentioned refunds in our next FEC report filed.

Should you have any further questions or concerns regarding this matter please feel free to contact me at 248-371-7271. I will be happy to assist you.

Respectfully,



Audrey L. Cox
PAC Account Analyst

Encl.

20110318 11:46

**VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)**

1501 M Street NW
Suite 1100
Washington, DC 20005

PAY *Three hundred twenty and 00/100 Dollars*

TO THE ORDER OF Debra Lee



Date
01 / 05 / 11

Check Number
11-10410

99
720

PAY EXACTLY
*****\$320.00

Ronald A. Ferguson

03379 (5/03)

11030583179

**VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)**

** A Multi-Candidate Committee **

Refund of 2010 Contribution Overage



Check Number
11-10410

Date
01 / 05 / 11

Amount
*****\$320.00

NOT NEGOTIABLE
Please Detach Check From This Voucher

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
1501 M Street NW
Suite 1100
Washington, DC 20005

PAY Five hundred ten and 00/100 Dollars

TO THE ORDER OF Michael Fricklas



Date
01/05/11

Check Number
11-10406

PAY EXACTLY
*****\$510.00

Ronald A. Fricklas

03379 (5/03)
11030583180

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
** A Multi-Candidate Committee **

Refund of 2010 Contribution Overage

Check Number
11-10406

Date
01/05/11

Amount
*****\$510.00



NOT NEGOTIABLE
Please Detach Check From This Voucher

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
1501 M Street NW
Suite 1100
Washington, DC 20005

PAY *Five hundred ten and 00/100 Dollars*

TO THE ORDER OF **Andra Shapiro**



Date
01 / 05 / 11

Check Number
11-10407

99
720

PAY EXACTLY
*****\$510.00

Ronald A. Shapiro

00379 (5/03)

11030583181

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
** A Multi-Candidate Committee **

Refund of 2010 Contribution Overage

Check Number
11-10407

Date
01 / 05 / 11

Amount
*****\$510.00



NOT NEGOTIABLE
Please Detach Check From This Voucher

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
1501 M Street NW
Suite 1100
Washington, DC 20005

Date
01 / 05 / 11

Check Number
11-10411

99
720

PAY EXACTLY
*****\$510.00

PAY Five hundred ten and 00/100 Dollars

TO THE ORDER OF William Roedy



Ronald A. Ferguson

FD-379 (5/03)

11030583182

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
** A Multi-Candidate Committee **

Check Number
11-10411

Date
01 / 05 / 11

Amount
*****\$510.00

Refund of 2010 Contribution Overage



NOT NEGOTIABLE
Please Detach Check From This Voucher

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
1501 M Street NW
Suite 1100
Washington, DC 20005

Date
01/05/11

Check Number
11-10408

99
720

PAY EXACTLY
*****\$320.00

PAY *Three hundred twenty and 00/100 Dollars*

TO THE ORDER OF Loretha Jones



Ronald A. Ferguson

PO3379 (5/03)

11010508110

VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)
** A Multi-Candidate Committee **

Check Number
11-10408

Date
01/05/11

Amount
*****\$320.00

Refund of 2010 Contribution Overage



NOT NEGOTIABLE
Please Detach Check From This Voucher

**VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)**

1501 M Street NW
Suite 1100
Washington, DC 20005

PAY Five hundred ten and 00/100 Dollars

TO THE ORDER OF Judith McGrath



Date
01 / 05 / 11

Check Number
11-10409

9-9
720

PAY EXACTLY
*****\$510.00

Ronald A. Ferguson

P03379 (5/03)

11030593184

**VIACOM INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE (VIACOM PAC)**

** A Multi-Candidate Committee **

Refund of 2010 Contribution Overage



Check Number
11-10409

Date
01 / 05 / 11

Amount
*****\$510.00

NOT NEGOTIABLE
Please Detach Check From This Voucher



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 15, 2011

NANCY CUSHMAN, TREASURER
VIACOM INTERNATIONAL, INC. POLITICAL
ACTION COMMITTEE
1501 M STREET SUITE 1100
WASHINGTON, DC 20005

Response Due Date
04/19/2011

IDENTIFICATION NUMBER: C00167759

REFERENCE: YEAR-END REPORT (11/23/2010 - 12/31/2010)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Schedule A 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(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

The Commission notes the attached text on your report: "Please note the following six individuals have exceeded their \$5000 contribution limit: Michael Fricklas, Loretha Jones, Debra Lee, Judith McGrath, William Roedy & Andra Shapiro. We will be issuing refund checks and they will be reported as such on our next FEC filing." Please provide the date of this refund and provide a photocopy of the refund check sent to the individual(s).

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1)

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VIA COM INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE

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transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

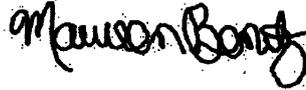
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify 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) 694-1147.

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VIACOM INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE

Page 3 of 3

Sincerely,



Maureen Benitz
Senior Campaign Finance and Reviewing Analyst
Reports Analysis Division

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Excessive Contribution From a Committee/Individual

Contributor Name	Date	Amount	Report
Loretha Jones	1/29/2010	\$570	2010 February Monthly
Loretha Jones	2/4/2010	\$380	2010 March Monthly
Loretha Jones	3/2/2010	\$760	2010 April Monthly
Loretha Jones	4/16/2010	\$380	2010 May Monthly
Loretha Jones	5/21/2010	\$380	2010 June Monthly
Loretha Jones	6/30/2010	\$380	2010 July Monthly
Loretha Jones	7/27/2010	\$380	2010 August Monthly
Loretha Jones	8/25/2010	\$570	2010 September Monthly
Loretha Jones	10/12/2010	\$380	2010 12 Day Pre-General
Loretha Jones	10/18/2010	\$760	2010 30 Day Post-General
Loretha Jones	12/16/2010	\$380	2010 Year End
Debra Lee	1/29/2010	\$570	2010 February Monthly
Debra Lee	2/4/2010	\$380	2010 March Monthly
Debra Lee	3/2/2010	\$760	2010 April Monthly
Debra Lee	4/16/2010	\$380	2010 May Monthly
Debra Lee	5/21/2010	\$380	2010 June Monthly
Debra Lee	6/30/2010	\$380	2010 July Monthly
Debra Lee	7/27/2010	\$380	2010 August Monthly
Debra Lee	8/25/2010	\$570	2010 September Monthly
Debra Lee	10/12/2010	\$380	2010 12 Day Pre-General
Debra Lee	10/18/2010	\$760	2010 30 Day Post-General
Debra Lee	12/16/2010	\$380	2010 Year End
Michael Fricklas	1/6/2010	\$1,140	2010 February Monthly
Michael Fricklas	3/2/2010	\$380	2010 April Monthly
Michael Fricklas	5/21/2010	\$950	2010 June Monthly
Michael Fricklas	6/4/2010	\$760	2010 July Monthly
Michael Fricklas	7/27/2010	\$380	2010 August Monthly
Michael Fricklas	8/25/2010	\$380	2010 September Monthly
Michael Fricklas	9/29/2010	\$380	2010 October Monthly

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Michael Fricklas	10/12/2010	\$190	2010 12 Day Pre-General
Michael Fricklas	10/28/2010	\$570	2010 30 Day Post-General
Michael Fricklas	12/3/2010	\$380	2010 Year End
Judith McGrath	1/6/2010	\$950	2010 February Monthly
Judith McGrath	2/24/2010	\$380	2010 March Monthly
Judith McGrath	3/30/2010	\$760	2010 April Monthly
Judith McGrath	5/21/2010	\$380	2010 June Monthly
Judith McGrath	6/4/2010	\$950	2010 July Monthly
Judith McGrath	7/27/2010	\$190	2010 August Monthly
Judith McGrath	8/5/2010	\$380	2010 September Monthly
Judith McGrath	9/7/2010	\$570	2010 October Monthly
Judith McGrath	10/18/2010	\$570	2010 30 Day Post-General
Judith McGrath	12/3/2010	\$380	2010 Year End
William Roedy	1/6/2010	\$950	2010 February Monthly
William Roedy	2/24/2010	\$380	2010 March Monthly
William Roedy	3/30/2010	\$760	2010 April Monthly
William Roedy	5/21/2010	\$380	2010 June Monthly
William Roedy	6/4/2010	\$950	2010 July Monthly
William Roedy	7/27/2010	\$190	2010 August Monthly
William Roedy	8/5/2010	\$380	2010 September Monthly
William Roedy	9/7/2010	\$570	2010 October Monthly
William Roedy	10/18/2010	\$570	2010 30 Day Post-General
William Roedy	12/3/2010	\$380	2010 Year End
Andra Shapiro	1/6/2010	\$950	2010 February Monthly
Andra Shapiro	2/24/2010	\$380	2010 March Monthly
Andra Shapiro	3/30/2010	\$760	2010 April Monthly
Andra Shapiro	5/21/2010	\$380	2010 June Monthly
Andra Shapiro	6/4/2010	\$950	2010 July Monthly
Andra Shapiro	7/27/2010	\$190	2010 August Monthly
Andra Shapiro	8/5/2010	\$380	2010 September Monthly

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Andra Shapiro	9/7/2010	\$570	2010 October Monthly
Andra Shapiro	10/18/2010	\$570	2010 30 Day Post- General
Andra Shapiro	12/3/2010	\$380	2010 Year End

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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.

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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>fed Ex</i>	Shipping Date <i>3/17/11</i>
Next Business Day Delivery <input checked="" type="checkbox"/>	
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<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

PH
PREPARER*3/18/11*
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