



Montana Shooting Sports Association, Inc.

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Asserting the Rights of Gun Owners in Montana

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February 17, 2015

Christopher Morse
Senior Campaign Finance Analyst
Federal Elections Commission
Washington, D.C. 20463

Re: C00322958

Dear Mr. Morse,

I am in receipt of your letter of January 14, 2015. In that letter you advise me that information reported to the FEC on Line 11(a)(i) should actually be reported on Line 11(a)(ii).

Be advised that MSSA PAC is a quarterly filer, and that we receive exactly the same letter from you every quarter. As I have explained to you on the phone, the FEC-supplied software for electronic filing DOES NOT ALLOW entry of the desired information on any Line 11(a)(ii). Selecting this Line simply doesn't exist in the FEC reporting software data input options. The FEC software AUTOMATICALLY inserts the supplied information into Line 11(a)(i).

Said differently, the FEC software pops up a box that allows the user to enter the requested information. After having entered the requested information in the box, the user must click the "OK" button to complete the entry, and the software puts the information (without choice to the user) into Line 11(a)(i) of the report. The software user IS OFFERED NO CHOICE over what line this information is applied to.

I know that you have told me over the phone that there is some non-intuitive series of tweaks that can be done to the FEC software that can trick it into creating a later opportunity to move supplied information from Line 11(a)(i) to Line 11(a)(ii). Sorry, but that is just no longer acceptable.

Upon call to the FEC to straighten out this problem in the past, advisors at the FEC have coached me to enter a particular one-time software override code supplied by them to also allow moving the supplied information from Line

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11(a)(i) to Line 11(a)(ii). Having to go through that process to be compliant is also unacceptable.

The purpose of this letter to notify you and the FEC that MSSA will no longer jump through special hoops every quarter or do some weird song and dance with the FEC software to trick it into placing the information that MSSA supplies into a line the FEC wants but its software makes otherwise unavailable. When the FEC software is corrected to accept the information supplied into the correct report line upon entry of that information into the software, MSSA will put the information into the correct pigeonhole. Until then, the FEC will just have to accept that MSSA has made a good faith effort to comply with whatever laws and regulations may apply, even if your software places the information we supply into the wrong line of the report.

We believe that a reasonable person, or a reasonable judge, will conclude that MSSA has made a good faith attempt to comply with applicable laws and regulations. The rational solution is for the FEC to fix its deficient software rather than generating endless non-compliance notices, potential legal liability, and extra effort for MSSA.

Sincerely yours,



Gary Marbut, Treasurer
MSSA Political Committee

Cc: MSSA attorneys

Montana Shooting Sports Association

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Missoula, Montana 59806



Christopher Morse

Senior Campaign Finance Analyst

Federal Elections Commission

Washington, D.C. 20463

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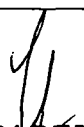
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<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received 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
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