

SBC
EmPACSBC Communications Inc.
Employee Federal Political Action CommitteeRECEIVED
FEDERAL ELECTION COMMISSION

2002 JUN 26 10 24 AM

June 24, 2002

Ms. Antoinette Kitchen
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: 000109017

Reference: February Monthly Report (1/1/02-1/31/02)

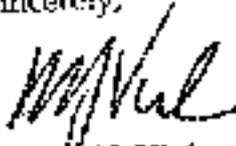
Dear Ms. Kitchen:

SBC EmPAC became aware of FEC Advisory Opinion 1996-29 pertaining to in-kind contributions upon receipt of your May 15, 2002 correspondence. Your correspondence stated that in-kind contributions for food and refreshments in connection with fundraising events for federal candidates were not considered to have a "long-term useful life" and could only be designated to the current election period.

Please be advised that SBC EmPAC made an in-kind contribution on behalf of Rep. Spencer Bachus, which was designated for the general election but made before the primary election, on January 6, 2002 and was reported in the February Monthly Report (1/1/02-1/31/02). SBC EmPAC has taken corrective action. A letter requesting a refund of this contribution was sent to the recipient campaign committee on June 20, 2002. Consistent with FEC reporting requirements, a future monthly filing will report our receipt of this refunded contribution.

Please let me know if you require further information or have additional questions.

Sincerely,



Michael J. Viola
Treasurer, SBC EmPAC

SBC
EmPAC

SBC Communications, Inc.
 Employee Federal Political Action Committee

REGULATORY
 FEDERAL ELECTIONS

2002 JUN 26 9 24 AM

June 20, 2002

Bachus for Congress
 P.O. Box 59444
 Birmingham, Al. 35259

Attention: Bachus for Congress

SBC EmPAC made an in-kind contribution to "Bachus for Congress" on January 21, 2002 in the amount of \$924.30 designated to the 2002 General election. This in-kind contribution was in connection with a fundraising event for Congressman Bachus hosted by SBC and held on January 6, 2002 at the FedEx Center in Landover, MD.

The FEC has advised us that "Advisory Opinion 1996-29" states that in-kind contributions for food and refreshments in connection with fundraising events are not deemed to have a "long-term useful life" and can only be designated to the current election. Since this in-kind contribution was made prior to the Alabama primary election, the designation to the general election was not permissible, according to the FEC. In order to comply with the FEC Advisory Opinion, SBC EmPAC is requesting a refund of this in-kind contribution in the amount of \$924.30. I have attached a copy of the contribution and the FEC Advisory Opinion for your reference.

Please do not hesitate to contact me at 202.326.8819 if you have any questions.

Sincerely,

Angela Hanratty
 Manager-SBC EmPAC

Attachments

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt 6-26-02
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>JL</i> PREPARER	6-26-02 DATE PREPARED

2002年6月26日 星期二 14:00:00