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2000 DEC 13 A 10 25

VIA FEDERAL EXPRESS

December 12, 2000

Ms. Antoinette Kitchen  
Reports Analyst  
Report Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: Northwestern Mutual Life Federal Political Action Committee ("NML FEDPAC")

Identification Number: C00197095

References: July Quarterly Report (4/1/00 - 6/30/00)  
12 Day Pre-Primary Report (7/1/00 - 8/23/00)

With respect to the Schedule B supporting Line 23 matter in both reports, please see the attached correspondence between John Gibson and Steven Kantor of GNOSSOS Software. It is our understanding that this correspondence is still in effect. Therefore, please note that on Schedule B supporting Line 23 on the above-referenced reports, all disbursements ("Contributions to Federal Candidates/Committees") which do include a district number along with the state and party affiliation are for contributions to federal House/Representative candidates. Those disbursements which do not include a district number are for contributions to a federal Senate candidate.

With respect to the 12 Day Pre-Primary Report's contribution to Wisconsin Victory 2000, please be advised that this was mis-named on the report. This was a contribution to the Republican Party of Wisconsin -- Federal Committee. I spoke to Ms. Luella Schmidt at the Republican Party of Wisconsin (608-257-4765), who confirmed this. An amended Schedule B is enclosed showing the correct name for this contribution.

Please be further advised that I have today confirmed with Mr. Pomeroy's office that he had correctly designated this contribution on his report for the 1998 General Election.

Should you have further questions, or need additional information, please do not hesitate to contact me at 414-665-2508.

Very truly yours,

Sara A. Holm  
Assistant Treasurer  
NML FEDPAC

cc: James Balagna

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July 25, 2000

Mr. John Gibson  
Director, Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Mr. Gibson,

Ann DeSeta and I appreciated the opportunity to meet with you and your colleagues recently regarding client filings of FEC compliance reports generated by Keep In Touch. I am writing to reiterate our discussion, to provide some follow-up information for your review, and to solicit your input and approval as to the next steps needed to be taken by Gnosso Software in order to ensure that our software continues to comply with all relevant FEC regulations.

To recap our discussion, it had come to our attention that several clients began receiving letters from the Reports Analysis Division identifying a problem with the format of our reports that has been approved and used for many years. More specifically, at least one of the letters used the following language:

Please amend Schedule B supporting Line 23 by providing the office sought for each contribution made. 11 CFR SS. 104.3(b)(3)(ii) and (v)

To our knowledge, this regulatory language has been in place since at least 1996 and possibly longer. Therefore, we were taken by surprise when the FEC altered its previous enforcement standard and began citing this problem. However, it is our foremost concern that our clients are in compliance, and I want to ensure that Keep In Touch continues to meet the FEC's compliance standards.

Therefore, as we agreed at our meeting, Gnosso Software is recommending to its clients who have been cited on this issue, that they respond to the FEC with a letter stating that disbursements which indicate a district number are House/Representative races while those without a district number are Senate races. An amended report is not a required response to this particular issue.

With your approval, I am proposing that I supply my clients with the following text for these letters:

Please note that on Schedule B supporting Line 23, all disbursements ("Contributions to Federal Candidates/Committees") which do include a district number along with the state and party affiliation are for contributions to federal House/Representative candidates. Those disbursements which do not include a district number are for contributions to a federal Senate candidate.

If you do not agree that this proposed language meets the needs, I would appreciate any suggestions or input you might be able to provide regarding this language.

Please note that I do recognize that this is a temporary solution, and that I intend to rectify this in our next version of the software, due out in February 2001, in time for the February monthly reporting period. I respectfully request your concurrence with this timeframe and your agreement to continue to use the above agreed-upon solution until then.

In addition, I need you to specify for us for our programming purposes, exactly what terms are required to be reflected to comply with this "office sought" distinction. You may recall that we were unable to locate a regulatory cite for how this is supposed to read at the time of our meeting, and I am hoping you have been able to identify the appropriate cite since then.

Additionally, I want to confirm with you that I have followed up on a question that was raised during our discussion regarding any distinctions (on this Schedule B, line 23 issue) between our electronically filed and paper filed reports. I have learned that our product's specifications for the electronically filed reports do include specific programming, which distinguishes a "House/Representative" contribution from a "Senate" contribution. Therefore, any one of our 50 or so clients who are electronically filing their FEC reports should not be encountering this problem.

Thank you again for meeting with us regarding this issue as well as your assistance in clarifying the outstanding issues identified in this correspondence. I look forward to hearing from you soon. If you need to contact me, please do not hesitate to call at 202-463-1200, Ext. 408.

Sincerely,

Steve Kantor  
President

SCHEDULE B

Amended

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 2  
FOR LINE NUMBER 23

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
Northwestern Mutual Life Insurance Company Federal Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this Period
Wisconsin Victory 2000 P. O. Box 31 Madison, WI 53701 <i>Republican Party of Wisconsin - Federal Committee</i>	Contribution: Wisconsin Victory 2000 (WI-) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	07/17/2000	\$5,000.00
Republican National Committee 310 First Street, S.E. Washington, DC 20003	Contribution: Republican Committee (DC-R) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	08/03/2000	\$1,000.00
Coyne for Congress (William J Coyne) 33rd Floor Gulf Tower 707 Grant Street Pittsburgh, PA 15222	Contribution: William J. Coyne (PA-14-D) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	07/17/2000	\$1,000.00
Gephardt In Congress Committee 7435 Watson Road Suite 107 St Louis, MO 63119	Contribution: Richard A. Gephardt (MO-3-D) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	08/03/2000	\$1,500.00
Friends Of Phil Gramm 906 Second Street, N.E. Suite 114 Washington, DC 20002	Contribution: Phil Gramm (TX-R) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2002	07/17/2000	\$2,000.00
Green for Congress PO Box 12571 Green Bay, WI 54307	Contribution: Mark Green (WI-8-R) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	08/08/2000	\$2,000.00
Friends of Jerry Kleczka 3150 A S. 12th Street Milwaukee, WI 53215	Contribution: Gerald D. Kleczka (WI-4-D) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	08/16/2000	\$3,500.00
Lazio 2000 72 East Main Street Suite 4 Babylon, NY 11702	Contribution: Rick Lazio (NY-??-R) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	08/16/2000	\$1,000.00
Lazio 2000 72 East Main Street Suite 4 Babylon, NY 11702	Contribution: Rick Lazio (NY-??-R) Disbursement For: <input type="checkbox"/> Other: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2000	08/03/2000	\$1,000.00

SUBTOTAL of Disbursements This Page (optional) ..... \$18,000.00  
TOTAL This Period (last page this line number only) .....

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 12/13/00
<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	
CR PREPARER	12/13/00 DATE PREPARED