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December 14, 2011

Rebecca Hough
Senior Campaign Finance & Reviewing Analyst
Reports Analyst Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: C90004185

Dear Ms. Hough:

The purpose of this letter is to respond to your letters dated November 14 and 15, 2011, regarding the July Quarterly Report (4/1/10 – 6/3/10), the October Quarterly Report (7/1/10 – 9/30/10), the Year End Report (10/1/10 – 12/31/10) and the July Quarterly Report (4/1/11 – 6/30/11) of NARAL Pro-Choice America, identification number C900041485.

Your letters inquire about the reporting of contributors on Form 5. The Commission's regulations require the disclosure of contributors when a "contribution was made for the purpose of furthering the reported independent expenditure." 11 C.F.R. § 109.10(e)(1)(vi). NARAL Pro-Choice America had no such contributors to report; as a matter of policy, it does not accept contributions earmarked for a specific political purpose.

Your letters regarding the July Quarterly Report (4/1/10 – 6/3/10), the October Quarterly Report (7/1/10 – 9/30/10), and the Year End Report (10/1/10 – 12/31/10) also inquire about items on the 24 or 48 hour reports that are not on Schedule 5-E of the quarterly filing, and about items on Schedule 5-E of the quarterly filing that are not on the 24 or 48 hour reports. We have compared your attachments to our records and, for every entry on the 24- or 48-hour reports (except where noted below), there is a corresponding entry on Schedule 5-E, and vice versa. The expenditure amounts differ, due to the nature of the 24- and 48-hour reports as estimates; Schedule 5-E reflects the final and accurate expenditure amounts.

The following Schedule 5-E entries do not have corresponding 24- or 48-hour report entries:

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- Adams, Hussey & Associates 8/17/2010 \$21.21 Print design
- Pacific East 4/20/2010 \$75.00 Dataprocessing
- Share Group 4/20/2010 \$953.93 Telemarketing

These amounts were not required to be reported on 24- or 48-hour reports, due to the size of the expenditures and NARAL Pro-Choice America's aggregate spending for those elections.

There are also seven entries on Schedule 5-E dated November 2, 2011, for which there are no corresponding 24-hour reports. These expenditures were made on the day of the general election, and no 24-hour reports for those expenditures were necessary. See 11 C.F.R. § 109.10(d).

The following 24- or 48-hour report does not have a corresponding Schedule 5-E entry:

- Tri-State 4/20/2010 \$32.86 Printing

NARAL Pro-Choice America will amend its Schedule 5-E entry for the July Quarterly Report to include this expenditure.

There is an error in the decimal placement for the following entry:

- NARAL Pro-Choice America 6/9/2010 \$36,538.00 List rental

NARAL Pro-Choice America will amend this 48-hour notice to reflect the amount as estimated at the time: \$362.58. Note that the final and correct amount of \$362.00 is listed on the Schedule 5-E entry for the July Quarterly Report.

Some 24- and 48-hour reports in October 2010 incorrectly listed NARAL Pro-Choice America as the payee instead of NARAL Pro-Choice America Foundation. The Schedule 5-E entries state the correct payee. NARAL Pro-Choice America will amend the affected 24- and 48-hour reports to include the correct payee.

If you need any further information, please do not hesitate to contact me.



Very truly yours,

Ezra W. Reese
Counsel to NARAL Pro-Choice America

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
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