

{Due to the fact that FECfile software does not allow Form 99 reports to be larger than 4,000 characters, this report is one of three (1/3) Balch & Bingham Federal Political Action Committee will file in response to the letter received May 17, 2006 from the FEC requesting information concerning administrative expenses associated with B&B PAC. These three reports are actually taken from one letter prepared in response to the FEC's questions. There will be two additional reports following this one.}

June 16, 2006

Jennifer Thangavelu
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Balch & Bingham LLP Federal Political Committee
Identification Number C00358440

Dear Ms. Thangavelu:

Balch & Bingham LLP Federal Political Committee (B&B PAC) received your letter dated May 17, 2006 requesting information concerning administrative expenses associated with B&B PAC. Specifically, you have requested that B&B PAC provide the Federal Election Commission (Commission or FEC) with administrative expense information related to the 2005 Mid-Year Report (1/1/05 - 6/30/05), the 2005 Year End Report (7/1/05 - 12/31/05), and the April 2006 Quarterly Report (1/1/06 - 3/31/06). This letter will respond to your request and provide additional information for the Commission's consideration.

As you may know, B&B PAC is a non-connected political committee that receives almost all of its contributions from partners in the Balch & Bingham LLP law firm (Firm). Other than the very limited accounting support from Firm staff described below, all B&B PAC management and administration is done on a volunteer basis by firm partners and PAC officers. Although I am Treasurer of B&B PAC and Director of Government Relations for the Firm, I am not an attorney. However, I receive no remuneration from the Firm for the limited amount of time I spend on B&B PAC matters and all of my involvement with the PAC is purely voluntary. Indeed, most of the time I spend in this regard is on my personal time, including lunch hours, nights and weekends.

Until summer of 2004, no Firm administrative personnel were involved in any aspect of B&B PAC. At that time, B&B PAC decided to offer the Firm's partners a voluntary automatic payroll deduction opportunity to facilitate contributions to the PAC. To initiate this process, a member of the Firm's accounting staff simply modified the existing payroll software to include a B&B PAC contribution entry for each Firm partner who signed a pledge card authorizing the deduction. This initial administrative activity took less than thirty minutes to complete. Because distributions to the Firm's partners are made on a monthly basis, the accounting staff provides a check to B&B PAC once a month that reflects that month's total of all partner contributions. The only other administrative support that the Firm provides to B&B PAC is the preparation of a list that is sent to me at the end of each reporting period that itemizes the total contribution amounts for each partner during that reporting period.

This list, which can be generated almost instantaneously from an existing spreadsheet program, is used to prepare our B&B PAC reports to the FEC.
