

LAW OFFICES OF
**NIELSEN, MERKSAMER,
PARRINELLO, MUELLER & NAYLOR, LLP**
A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

SACRAMENTO
770 L STREET, SUITE 800
SACRAMENTO, CALIFORNIA 95814
TELEPHONE (916) 446-6732
FAX (916) 446-6714

591 REDWOOD HIGHWAY, #4000
MILL VALLEY, CALIFORNIA 94941
TELEPHONE (415) 389-6800
FAX (415) 388-6874

SAN FRANCISCO
120 MONTGOMERY STREET, SUITE 1055
SAN FRANCISCO, CALIFORNIA 94104
TELEPHONE (415) 389-6800
FAX (415) 388-6874

July 24, 1998

Ms. Melissa Hurd
Reports Analyst,
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Response to July 15, 1998 to Letter to Tupperware
Political Action Committee's regarding its February
Monthly Report (1/1/98-1/31/98)

Dear Ms. Hurd:

I am writing in response to your recent letter to the Tupperware Political Action Committee ("Tupperware PAC; ID No. C00317529) regarding an alleged excessive contribution made by Tupperware PAC to U.S. Senator Connie Mack's 2000 re-election. According to your letter, this contribution exceeded the limits set forth in the Federal Election Campaign Act because your records show Tupperware PAC as a non-multicandidate committee.

I understand that on Tuesday, July 21, 1998, you had a telephone conversation with Kerry Murphy, Manager of Nielsen, Merksamer's Political Reporting Unit, regarding this matter. In this call, Mrs. Murphy notified you of Tupperware PAC's former affiliation with Premark International, Inc. and its federal political action committee, Premark Political Action Committee (ID No. C00212811).

For your information, Tupperware PAC amended its FEC Form 1 on April 24, 1996, naming Premark as its connected organization and Premark PAC as an affiliated committee. At that time, Tupperware was a wholly owned subsidiary of Premark, and by virtue of that connection, its PAC qualified for multicandidate status based on Premark PAC's multicandidate qualification prior to January 1, 1994.

According to your conversation with Mrs. Murphy, although Tupperware and Tupperware PAC are no longer owned by, or affiliated with Premark, Tupperware PAC does not lose its multicandidate status due to the sale of Tupperware by Premark.

JUL 21 12 18 PM '98

RECEIVED
FEDERAL ELECTION
COMMISSION

Ms. Melissa Hurd
July 23, 1998
Page 2

As such, the contribution referenced on Schedule B of the February Monthly report (\$1,000 contribution to Friends of Connie Mack) does not exceed the limits set forth in the Act for a multicandidate committee, and a request for a refund to Friends of Connie Mack will not be submitted by Tupperware PAC. In other words, Tupperware has been able to contribute up to \$5,000 per federal candidate per election since April 1996, and was legally allowed to contribute \$2,000 toward Senator Mack's 2000 re-election.

Should you have any questions, please do not hesitate to call me at 415/389-6800. Thank you for your assistance.

Sincerely,



James R. Sutton
Assistant Treasurer
Tupperware PAC

KLM/elf
cc: Richard A. Lisec
6961.02

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 type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 7-24-98
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<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>SEP</i> PREPARER	7-28-98 DATE PREPARED