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July 6, 2007

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VIA HAND DELIVERY

Ms. Vicki Hubbard
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: Americans for Honesty on Issues

Dear Ms. Hubbard:

As counsel to Americans for Honesty on Issues ("AHI"), I am responding to your June 5, 2007 letter addressed to AHI's Custodian of Records, directing her to file an amended Form 9 clarifying why the additional activity reported in the November 8, 2006 amended filing was not included in the original October 31, 2006 report. You indicated in our June 15, 2007 phone conversation that a letter to you would suffice in lieu of another amended Form 9.

As AHI's former Custodian of Records stated in the cover letter to the November 8 filing, she made an inadvertent mistake in overlooking two disbursements made to a media vendor for broadcast time that were among two others made to the same vendor that were properly captured on the original filing.¹ These two were in addition to 23 other electioneering communications disbursements that were accurately reported on Form 9s between October 10 and November 8, 2006.

In fact, the disbursements at issue merely reflected:

- o That the initial estimate of production costs (for "Why Jon Tester?") reported on the initial filing on October 31, 2006 per the vendor's guidance, and subsequently amended on November 3, 2006 to reflect actual costs (an additional \$15,175), was carried forward to the November 8th amended filing at issue.

¹ AHI's Form 9 filings accurately disclosed donations received for the purpose of making electioneering communications.

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- Additional broadcast time for two communications ("Six Years and Zip" -- \$153,224.11 - and "Tagged" -- \$96,965.08) whose initial disbursements for broadcast time were reported on the October 10th Form 9 filing. The additional disbursements for broadcast time for these two communications were not for new communications but more of the same ads with the same content directed toward the same demographics (35+) in the same media markets.

Please let me know if you have any questions.

Sincerely,



Glenn M. Willard
Counsel to AHI

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Federal Election Commission
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