

American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
614 223 1000
614 223 1687 (Toll-free)

Writer's Direct Dial No.

(614) 223-1647

March 30, 1998

RECEIVED
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COMMISSION MAIL ROOM

APR 2 12 02 PM '98



BY FACSIMILE (202)219-3496 AND BY FIRST CLASS MAIL

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: C00096842

Dear Mr. Davis:

This letter is in response to your letter dated March 13, 1998 addressed to Ms. Doreen Hohl, Treasurer of the American Electric Power Committee for Responsible Government. Your letter objects to the name of the American Electric Power Committee for Responsible Government as not including the "full" name of the connected organization.

The American Electric Power Committee for Responsible Government has existed under this name for more than 20 years. Its sponsoring organization is American Electric Power Service Corporation. There are many connected organizations, including Ohio Power Company, Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, and Kingsport Power Company. Every one of these companies has registered an assumed name of American Electric Power with one or more secretaries of state. Attached are examples of the registrations of the assumed name American Electric Power.

We received a similar letter in 1989, objecting to the name of The American Electric Power Fuel Supply Political Action Committee, also sponsored by American Electric Power Service Corporation dba American Electric Power. After exchanging correspondence regarding the name, the matter was dropped by the Federal Election Commission without further action. I have enclosed a copy of my 1989 letter regarding this same issue.

Given the fact that each of the companies connected to the American Electric Power Committee for Responsible Government is legally registered as doing business under the name of American Electric Power, I believe the requirement that the "full" name be used is satisfied. Please address any further inquiries regarding the name of the PAC to me. Thank you for your consideration.

Very truly yours,


Barbara A. Belville

John F. DiLoreto, Jr.
Vice President, Secretary
and Associate General Counsel

Earl Goldhammer
Tax Counsel

Edward J. Brady
Chief Counsel - Regulatory Services

D. Michael Miller
Chief Counsel - Power Generation
and Director of Litigation

John B. Shinnokh
Chief Counsel - Energy Delivery

Thomas S. Ashford
Daniel W. Keane
John M. Adams, Jr.
Michael L. Walker
Assistant General Counsel

Michael R. Luis
Assistant Tax Counsel

Marvin I. Resnik
Kevin F. Duffy
James R. Bahta
Senior Rate Counsel

F. Mitchell Dutton
Rate Counsel

Joseph E. McDonough
Real Estate Counsel

Kevin D. Mack
Environmental Counsel

Timothy A. King
Barbara A. Belville
Aus G. Graf
Thomas G. Berkemeyer
Senior Attorney

David C. House
John W. Seidenhicker
Thomas B. St. Pierre
Anthony J. Swaseck
Attorneys

LEVEL 1 - 15 OF 33 DOCUMENTS

*** THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED THROUGH THE OFFICE OF THE OHIO SECRETARY OF STATE. ***

OHIO SECRETARY OF STATE, CORPORATE RECORD

NAME: AMERICAN ELECTRIC POWER

TYPE: TRADE NAME

STATUS: ACTIVELY REGISTERED

DATE OF INCORPORATION/QUALIFICATION: 11/03/1995

COUNTY OF PRINCIPAL OFFICE: FRANKLIN

REGISTRANT: AMERICAN ELECTRIC POWER ETC

REGISTERED OFFICE: 1 RIVERSIDE PLZ
COLUMBUS
43215-2373

CHARTER NUMBER: RN208986

HISTORY:

DATE	TRANSACTION	ROLL	FRAME
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11/03/1995	TRADE NAME/ORIGINAL FILING	5330	1589

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10TH DOCUMENT of Level 1 printed in FULL format.

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OHIO SECRETARY OF STATE, CORPORATE RECORD

NAME: AMERICAN ELECTRIC POWER SERVICE CORPORATION

TYPE: FOREIGN FOR PROFIT LICENSE

STATUS: IN GOOD STANDING

DATE OF INCORPORATION/QUALIFICATION: 08/19/1958

STATE OF INCORPORATION: NEW YORK

REGISTERED AGENT: JOHN F. DILORENZO, JR.

REGISTERED OFFICE: 1 RIVERSIDE PLZ., PO BOX 16631
COLUMBUS
43216

CHARTER NUMBER: 273497

CAPITAL/STOCK: 11876 (shares allocated to Ohio)

HISTORY:

DATE	TRANSACTION	ROLL	FRAME
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01/02/1998	'97 FORM 7, NO FEE ASSESSED	6140	1423
12/31/1996	'96 FORM 7, NO FEE ASSESSED	5905	1326
01/03/1996	'95 FORM 7, NO FEE ASSESSED	5436	0686
11/03/1995	TRADE NAME/ORIGINAL FILING AMERICAN ELECTRIC POWER	5330	1591
12/20/1994	'94 FORM 7, NO FEE ASSESSED FOREIGN/CHANGE OF PRINCIPAL OFFICE OUTSIDE OHIO	5023	0676
12/21/1993	'93 FORM 7, NO FEE ASSESSED	9411	0748
12/31/1991	'92 FORM 7, NO FEE ASSESSED FOREIGN/CHANGE OF PRINCIPAL OFFICE OUTSIDE OHIO	H008	0254
12/31/1990	'91 FORM 7, NO FEE ASSESSED	H002	1976
02/21/1990	'89 FORM 7, FEE ASSESSED	G805	1916
12/31/1989	'90 FORM 7, NO FEE ASSESSED	G996	0039
10/14/1988	'88 FORM 7, NO FEE ASSESSED	F916	1791
11/16/1987	'87 FORM 7, FEE ASSESSED	G274	1457
01/03/1986	'85 FORM 7, FEE ASSESSED	F805	1435
00001986	'86 FORM 7, NO FEE ASSESSED		
03/29/1985	'84 FORM 7, FEE ASSESSED	F637	0852
05/24/1984	'83 FORM 7, FEE ASSESSED	F459	1479
12/20/1983	FOREIGN/AGENT CHANGE OF ADDRESS	F372	0463

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VIRGINIA SECRETARY OF STATE, CORPORATE RECORD

Name: AMERICAN ELECTRIC POWER SERVICE CORPORATION

Business Address: 1 RIVERSIDE PLAZA
COLUMBUS, OH 43215

Type: CORPORATION

Status: ACTIVE

Status Date: 4/26/1982

Filing Date: 4/3/1975

Duration: PERPETUAL

State of Incorporation: NEW YORK

Registered Agent: EDWARD R PARKER

Registered Office: 5511 STAPLES MILL RD.
RICHMOND, VA 23228

Agent Status: ACTIVE

Doing Business As: AMERICAN ELECTRIC POWER

Additional Information: INDUSTRY: GENERAL

Number: F029127

Stock:

Type of Stock: COMMON
Authorized Quantity: 20000
Convert Common Stock: NO

Officers/Directors/Partners/Members:

ADDIS, PAUL D
EXECUTIVE VICE PRESIDENT

CLEMENTS, JR., DONALD M.
EXECUTIVE VICE PRESIDENT

DEMARIA, PETER J
EXECUTIVE VICE PRESIDENT

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INDIANA SECRETARY OF STATE, CORPORATE/LTD PARTNERSHIP RECORDS

NAME: AMERICAN ELECTRIC POWER SERVICE CORPORATION

ASSUMED-NAME: AMERICAN ELECTRIC POWER IN Marion COUNTY; AMERICAN ELECTRIC POWER IN Allen COUNTY

TYPE: FOREIGN CORPORATION FOR-PROFIT

STATUS: ACTIVE

DATE OF INCORPORATION/QUALIFICATION: 03/31/1975

MAILING ADDRESS: 1 Riverside Plaza
ATTN Tax Dept
COLUMBUS, OH 43215

STATE OF INCORPORATION: NEW YORK

REGISTERED AGENT: C T CORPORATION SYSTEM

REGISTERED OFFICE: ONE NORTH CAPITOL
INDPLS IN, IN 46204

ANNUAL-REPORT: 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992,
1993, 1994, 1995, 1996, 1997, 1998

PRESIDENT: E. Linn Draper Jr.
1 RIVERSIDE PLE
COLUMBUS OH, OH 43215

SECRETARY: J. F. DiLorenzo, Jr.
1 RIVERSIDE PLAZA
COLUMBUS, OH 43215

NUMBER: 197503-645

HISTORY: ANNUAL REPORT FOREIGN FOR-PROFIT
FILED: 04/03/1991, EFFECTIVE: 04/03/1991

ASSUMED NAMES (DBA)
FILED: 11/27/1995, EFFECTIVE: 11/27/1995

ASSUMED NAMES (DBA)
FILED: 01/25/1996, EFFECTIVE: 01/25/1996

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OHIO SECRETARY OF STATE, CORPORATE RECORD

NAME: AMERICAN ELECTRIC POWER

TYPE: TRADE NAME

STATUS: ACTIVELY REGISTERED

DATE OF INCORPORATION/QUALIFICATION: 11/03/1995

COUNTY OF PRINCIPAL OFFICE: FRANKLIN

REGISTRANT: COLUMBUS SOUTHERN POWER CO

REGISTERED OFFICE: 215 N FRONT ST
COLUMBUS
43215

CHARTER NUMBER: RN208987

HISTORY:

DATE	TRANSACTION	ROLL	FRAME
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11/03/1995	TRADE NAME/ORIGINAL FILING	5330	1594

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OHIO SECRETARY OF STATE, CORPORATE RECORD

NAME: AMERICAN ELECTRIC POWER

TYPE: TRADE NAME

STATUS: ACTIVELY REGISTERED

DATE OF INCORPORATION/QUALIFICATION: 11/03/1995

COUNTY OF PRINCIPAL OFFICE: STARK

REGISTRANT: OHIO POWER COMPANY

REGISTERED OFFICE: 301 CLEVELAND AVE SW
CANTON
44701

CHARTER NUMBER: RN208988

HISTORY:

DATE	TRANSACTION	ROLL	FRAME
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11/03/1995	TRADE NAME/ORIGINAL FILING	5330	1598

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VIRGINIA SECRETARY OF STATE, CORPORATE RECORD

Name: APPALACHIAN POWER COMPANY

Business Address: 40 FRANKLIN RD
ROANOKE, VA 24011

Type: CORPORATION

Status: ACTIVE

Status Date: 12/31/1975

Filing Date: 3/4/1926

Duration: PERPETUAL

State of Incorporation: VIRGINIA

Date of Incorporation: 3/4/1926

Registered Agent: THOMAS E. MITCHELL

Registered Office: 40 FRANKLIN ROAD
ROANOKE, VA 24011

Agent Status: ACTIVE

Doing Business As: AMERICAN ELECTRIC POWER

Additional Information: INDUSTRY: ELECTRIC

Number: 29348

Stock:

Type of Stock: COMMON
Authorized Quantity: 30000000
Convert Common Stock: NO

Type of Stock: PREFERRED
Class of Stock: CUMUL
Authorized Quantity: 8000000

Officers/Directors/Partners/Members:

CARSON, JR., R. D.
VICE PRESIDENT

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INDIANA SECRETARY OF STATE, CORPORATE/LTD PARTNERSHIP RECORDS

NAME: INDIANA MICHIGAN POWER COMPANY

ASSUMED-NAME: AMERICAN ELECTRIC POWER IN Adams COUNTY; AMERICAN ELECTRIC POWER IN Allen COUNTY; AMERICAN ELECTRIC POWER IN Blackford COUNTY; AMERICAN ELECTRIC POWER IN Carroll COUNTY; AMERICAN ELECTRIC POWER IN Crawford COUNTY; AMERICAN ELECTRIC POWER IN Daviess COUNTY; AMERICAN ELECTRIC POWER IN Decatur COUNTY; AMERICAN ELECTRIC POWER IN Dearborn COUNTY; AMERICAN ELECTRIC POWER IN DeKalb COUNTY; AMERICAN ELECTRIC POWER IN Delaware COUNTY; AMERICAN ELECTRIC POWER IN Dubois COUNTY; AMERICAN ELECTRIC POWER IN Elkhart COUNTY; AMERICAN ELECTRIC POWER IN Fayette COUNTY; AMERICAN ELECTRIC POWER IN Fountain COUNTY; AMERICAN ELECTRIC POWER IN Franklin COUNTY; AMERICAN ELECTRIC POWER IN Fulton COUNTY; AMERICAN ELECTRIC POWER IN Grant COUNTY; AMERICAN ELECTRIC POWER IN Hamilton COUNTY; AMERICAN ELECTRIC POWER IN Hancock COUNTY; AMERICAN ELECTRIC POWER IN Harrison COUNTY; AMERICAN ELECTRIC POWER IN Henry COUNTY; AMERICAN ELECTRIC POWER IN Howard COUNTY; AMERICAN ELECTRIC POWER IN Huntington COUNTY; AMERICAN EL

TYPE: DOMESTIC CORPORATION FOR-PROFIT

STATUS: ACTIVE

DATE OF INCORPORATION/QUALIFICATION: 05/11/1907

ACTS: PROFIT

MAILING ADDRESS: 301 Cleveland Ave. S.W.
Canton, OH 44701

REGISTERED AGENT: CT Corp

REGISTERED OFFICE: One N Capitol Ave
Indianapolis, IN 46204

ANNUAL-REPORT: 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992,
1993, 1994, 1995, 1997, 1998

PRESIDENT: E. Linn Draper Jr.
Columbus, OH

SECRETARY: DILGRENZO JR. JOHN. F.
COLUMBUS OH, OH

FEIN: 350410455

NUMBER: 194110-019

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VIRGINIA SECRETARY OF STATE, CORPORATE RECORD

Name: KINGSPORT POWER COMPANY

Business Address: 40 FRANKLIN RD
ROANOKE, VA 24011

Type: CORPORATION

Status: ACTIVE

Status Date: 3/2/1978

Filing Date: 5/21/1917

Duration: PERPETUAL

State of Incorporation: VIRGINIA

Date of Incorporation: 5/21/1917

Registered Agent: THOMAS E. MITCHELL

Registered Office: 40 FRANKLIN ROAD
ROANOKE, VA 24011

Agent Status: ACTIVE

Doing Business As: AMERICAN ELECTRIC POWER

Additional Information: INDUSTRY: ELECTRIC

Number: 15685

Stock:

Type of Stock: COMMON
Authorized Quantity: 500000
Convert Common Stock: NO

Officers/Directors/Partners/Members:

CARSON, R D
VICE PRESIDENT

DEMARIA, P J
VICE PRESIDENT/CONTROLLER

LHOTA, WILLIAM J

Writer's Direct Dial No.

(614) 223-1647



Todd S. Hageman
Reports Analyst
Reports Analyst Division
Federal Election Commission
Washington, D. C. 20463

January 31, 1989

Identification Number: C00234963

Reference: Statement of Organization - The American
Electric Power Fuel Supply Political
Action Committee

Dear Mr. Hageman:

In response to your letter to David M. Cohen dated
January 18, 1989, and our telephone conversation
of January 30, 1989, in which you insisted that
federal law requires that the exact legal name
of the sponsoring company be included in its entirety
in the name of the separate segregated fund, let
me call your attention to the names of the following
separate segregated funds and the corresponding
sponsoring companies, all of which are on file
with the Federal Election Commission and all of
which are investor owned electric industry PACs:

<u>Name of Separate Segregated Fund</u>	<u>Name of Sponsor</u>
Commonwealth Edison Political Action Committee	Commonwealth Edison Company
Detroit Edison Political Action Committee - EDPAC - Federal	Detroit Edison Company
Gulf Power Employees' for Responsible Government, Inc.	Southern Company
Gulf States Utilities Federal Political Action Committee (AKA Gulf States Good Government Fund)	Gulf States Utilities Company
Houston Industries Political Action Committee	Houston Industries, Inc.
Illinois Power Employees Federal Political Action Committee	Illinois Power Company

Joseph Dowd
John H. Blomquist, Jr.
B. Shinnick
P. White
J. Blaney
S. Ashford
G. J. ...
R. ...
H. ...
B. ...
J. ...
L. ...
M. ...
D. ...
J. ...
M. ...

Todd S. Hageman
January 31, 1989
Page Two

Minnesota Power PAC

Minnesota
Power &
Light Co.

Nothern States Power Employee
Political Interest Committee

Nothern States
Power Company

Ohio Edison Employee Federal
Political Action Committee

Ohio Edison
Company

Pacific Power & Light Employee
Political Action Committee -
(Federal)

Pacific Power
& Light
Company

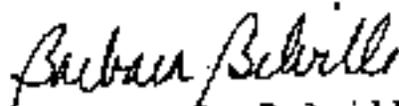
Puget Power Good Government
Committee - Federal

Puget Sound
Power &
Light Company

On the telephone you informed me that the policy requiring that the complete sponsor name be included in the name of the PAC was not new. I am therefore concerned as to why my client is being treated differently by the Federal Election Commission than the above companies. Certainly the omission of the words "Service Corporation" are no more significant than the omission of "& Light Co." from the Minnesota Power PAC, or "Sound" and "& Light Company" from Puget Power Good Government Committee - Federal, or any reference to "Southern Company" at all in the Gulf Power Employees' Committee for Responsible Government, Inc.

Please reconsider your request that the name of the PAC be changed.

Very truly yours,


Barbara A. Belville

BAB/mjl

