

June 12, 2006

Ms. Karen E. Trainer Campaign Finance Analyst Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: Year End Report (07/01/05 - 12/31/05) Planned Parenthood Action Fund Inc. PAC Identification Number C00314617

Dear Ms. Trainer:

This letter responds to your Request for Additional Information dated May 10, 2006 regarding the Year End Report of the Planned Parenthood Action Fund Inc. PAC (the "PAC").

1. Receipt of Funds from Connected Organization Totaling \$2,141.07

It is the policy of the PAC's connected organization, Planned Parenthood Action Fund Inc. (the "Action Fund") to reimburse the administrative expenses of the PAC. Several times a week, electronic bank statements and reports from vendors are reviewed to identify administrative expenses that were paid by the PAC. When an administrative expense is identified, funds are transferred from the Action Fund to the PAC to reimburse the PAC for the expense. The reimbursement is usually made less than a week after the expense was paid.

In reviewing reimbursements made during the period covered by the Year End Report, it appeared that some administrative expense reimbursements were made just outside the 30-day period after the expense was paid. The PAC transferred funds back to the Action Fund to return reimbursements made outside the period. This transfer was disclosed on the PAC's 2006 February Monthly Report. We will forward under separate cover a copy of the wire transfer confirmation of this transfer for inclusion on the public record.

In preparing this letter, we have reviewed the PAC's procedures to ensure that reimbursements are made within the 30-day period.

## 2. Best Efforts

All written and oral solicitations for contributions to the PAC include the statement, "Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and employer name of individuals whose contributions exceed \$200 in a calendar year," and a request for the contributor information. Subsequent reminders for the fulfillment of unpaid pledges also include the

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statement and contributor information request.

Within 30 days of receipt of a contribution to the PAC that does not include all the information requested in the solicitation (or an unsolicited contribution that does not include the required information), the PAC sends the contributor a follow-up request for information. The request also includes an acknowledgment of the contribution, but does not include material on any other subject. The follow-up request also includes a statement disclosing the requirement to collect and report contributor information. A pre-addressed return envelope is included.

For those contributors who do not respond to either the original request or the follow-up request, the PAC supplies to the Commission all information in its possession from other sources. For example, when the contributor is a board member of the Action Fund or a related organization, information is supplied from that organization's records. In addition, in all of its fundraising solicitations, the Action Fund asks contributors to provide their names, addresses, occupations and employer names. The Action Fund makes this information, to the extent it is provided by contributors, available to the PAC for use in its reports to the Commission.

If any additional contributor information for contributions disclosed on a report is received by the PAC after the report is filed, the PAC will disclose that data either in memo entries on its next regularly scheduled report, or by filing an amendment to the original report. The PAC's 2006 March Monthly Report included additional contributor information for two contributions received during the period covered by the Year End Report.

## 3. Unclear Employer Information

Schedule A supporting line 11(a)(i) on the Year End Report included one entry in which the contributor's employer was identified as "MN Conf UCC." The full name of that contributor's employer is Minnesota Conference United Church of Christ. An amended Year End Report is being filed concurrently with this letter; due to space limitations on the report form, the employer's name appears as "MN Conf United Church of Christ."

Sincerely,

/s/ Chris Korsmo

Chris Korsmo Treasurer