



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

William R. Tracy, Treasurer  
National Cotton Council Committee for  
the Advancement of Cotton  
1918 N Parkway  
P.O. Box 12292  
Memphis, TN 38182

APR 7 1999

Identification Number: C00023028

Reference: Year End Report (9/30/98-12/31/98)

Dear Mr. Tracy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 30 Day Post-General Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Your committee has filed a report that contains financial activity already disclosed on another report. Overlapping coverage dates create difficulties in accounting for cash flow from one report to another. Please amend this report by including only the financial transactions that occurred between 11/24/98 and 12/31/98. 2 U.S.C. §434(b)

-The totals listed on Lines 11(a)(i)-11(a)(iii), 11(d), 16, 17, 19, 20, 21(b), 23, 30 and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-It has come to the attention of the Federal Election Commission that the reports you have filed during the current election cycle do not reflect the appropriate coverage dates for quarterly filing status. Please be advised of the filing dates and coverage periods for the 1997-1998 election cycle and

fill in the appropriate dates on Line 5 of the Summary Page.

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<u>Report Type</u>	<u>Coverage Dates</u>	<u>Due Date</u>
Mid-Year	1/1/97-6/30/97	July 31, 1997
Year End	7/1/97-12/31/97	January 31, 1998
April Quarterly	1/1/98-3/31/98	April 15, 1998
July Quarterly	4/1/98-6/30/98	July 15, 1998
October Quarterly	7/1/98-9/30/98	October 15, 1998
12 Day Pre-General	10/1/98-10/14/98	October 22, 1998
30 Day Post-General	10/15/98-11/23/98	December 3, 1998
Year End	11/24/98-12/31/98	January 31, 1999

-Your report was not signed. Please amend this filing to include the original signature of the treasurer or the designated assistant treasurer. 2 U.S.C. §434(a)(1)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Matthew J. Petusky  
Reports Analyst  
Reports Analysis Division

