FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR - 3 1999

Peter Brereton, Treasurer
KeyCorp Political Action Committee
127 Public Square 7th Floor
Cleveland, OH 44114

Identification Number: C00073155

Reference: Amended 30 Day Post-General Report (10/1/98-11/23/98), received 1/13/99

Dear Mr. Brereton:

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:

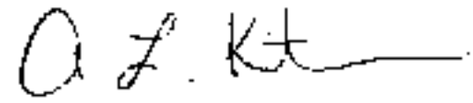
-Redesignations are reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. Furthermore, it should occur within 60 days of the original contribution 11 CFR § 110.2(b)(5)(ii)(B) and include the amount and date of the original contribution, as well as the amount and date the redesignation is made. Schedule B of your report (pertinent portion(s) attached), however, does not disclose the **amount or date** of the redesignation(s). Please amend your report accordingly.

-The totals listed on Lines 23 and 29, 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.

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,



Antoinette Kitchen
Reports Analyst
Reports Analysis Division

99034174283

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 2 OF 2

FOR LINE NUMBER 23

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
KeyCorp Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this Period
Friends of John LaFalce 115 Deerhurst Park Blvd. Kenmore, NY 14217	Contribution: John J. LaFalce (NY-29-D) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	10/22/98	$2,000.00
Friends of John LaFalce 115 Deerhurst Park Blvd. Kenmore, NY 14217	Contribution: John J. LaFalce (NY-29-D) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	11/2/98	$1,000.00
Centennial Spirit Donald K. Bain 1700 Lincoln Street, Suite 4100 Denver, CO 80203	Contribution: Scott McInnis (CO-3-R) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	10/27/98	$500.00
McNulty for Congress P.O. Box 1560 Green Island, NY 12183	Contribution: Michael R. McNulty (NY-21-D) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	10/27/98	$125.00
Re-Elect Congressman Joe Moakley Committee P.O. Box 1073 Boston, MA 02205-1073	Contribution: John J. Moakley (MA-9-D) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	10/6/98	$500.00
Reynolds for Congress P.O. Box 479 Victor, NY 14564	Contribution: Thomas Reynolds (NY-27-R) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	10/27/98	$1,000.00
Tom Sawyer Committee Stanley Apple, Treasurer 1540 West Market Street, Suite 201 Akron, OH 44313	Contribution: Thomas C. Sawyer (OH-14-D) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	11/2/98	$500.00
Sweeney for Congress Committee P.O. Box 4137 Clifton Park, NY 12065	Contribution: John E. Sweeney (NY-22-R) Disbursement For: [ ] Primary [X] General [ ] Other: 1998	10/14/98	$500.00
Mike DeWine for Senate P.O. Box 340188 Columbus, OH 43234	redesignation Disbursement for: [ ] Primary [X] General [ ] Other (specify) 2000	9/14/98	$ 0.00

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SUBTOTAL of Disbursements This Page (optional)	$6,125.00
TOTAL This Period (last page this line number only)	$17,125.00