ETEXT ATTACHMENT

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02/20/2002 16 : 03

February 20, 2002

Federal Election Commission
999 E Street NW
Washington, DC 20463

Identification Number: C00003418

RE: Amended February Monthly Report (1/01/01-1/31/01)

Dear Scott B. Walker:

This letter is in response to your request for additional information with respect to the Republican National Committee's ("RNC") February 2001 Monthly Report covering the period from January 1, 2001 through January 31, 2001.

This Report was the first monthly report filed by the RNC under the Federal Election Commission's ("FEC") electronic filing regulations, effective as of January 1, 2001.

Candidate Reimbursements

In response to your question regarding Schedule A Line 15, the RNC has an in-house production studio. This studio has a published production rate card, which reflects "commercially reasonable rates" for services. The reimbursement from a candidate on Schedule A, Line 15 reflects these charges for service based upon the usual and normal charge ("commercially reasonable rates").

American Express Disbursements

Please note our responses to similar requests for clarification in 2000. As we have explained in the past the payments on account to American Express were advances to American Express to cover anticipated travel expenses for the billable period in order to insure that the RNC's American Express card would continue to be honored during that particular period. For example, last year we had a high volume of travel expenses debited to our American Express credit card, which would have put us over our credit limit without such an advance. By the request of American Express, we made several prepayments on account. We reported these advances as disbursements when made on the appropriate FEC report and then reported the specific payees once the actual payee information was received, thereby requiring the initial advance to be reported as a negative disbursement to American Express. To reiterate, in order to report every vendor, we backed out the original prepayments on account to American Express. By doing this, we are able to list all expenses paid; with vendor names and addresses, without inflating our actual disbursements. We continue to follow that procedure.

Checking the "Category" Box

As mentioned earlier, January of 2001 was the first time we were required to file electronically. Since that time, we have worked with the FEC Program Department to insure proper and complete RNC electronic filings. In that regard, we have received from FEC staff detailed line by line-record layouts. These layouts have marked fields that are required. The field you are questioning " CATEGORY" was not a required field on these layouts and our reports have been processed through the FEC verifier program and accepted without this field. In fact, it took almost a full year from the filing of the RNC's electronic February 2001 Monthly Report for FEC staff to determine that this information was not reported in the proper field, although it was reported. A review of our electronic filings will disclose that the information you are requesting has in fact been disclosed in the field labeled "purpose/events". However, this amendment reflects the appropriately checked "Category" box for these disbursements as requested and 2002 RNC reports will reflect the same.