

April 27, 2007

Federal Election Commission  
Reports Analysis Division  
Attn: Karen E. Trainer  
999 E Street, NW  
Washington, DC 20463

ID# C00053553  
RE: Amended 30 Day Post-General Report (10/19/06-11/27/06)

Dear Ms. Trainer:

This letter is in response to your letter dated March 30, 2007 regarding the NRA Political Victory Fund s amended 30 Day Post-General Report (10/19/06-11/27/06) notifying us of missing 24 hour reports, missing disbursements associated with 24 hour reports previously filed, and requesting clarification for disbursements made for member mailing - postage and member mailing print & mail shown on Schedule B, Line 29.

The missing 24 hour notices relate to newspaper ads that ran election day, November 7, 2006. The newspaper ads for Rick Santorum and Conrad Burns were disseminated less than 24 hours before the election and a 24 hour report was not required.

In your letter, there was a spreadsheet entitled Independent Expenditures Not Disclosed on Schedule E. Attached is that spreadsheet with two additional columns listing the payment amount and the disclosure date. There needs to be some clarification with disbursements for two candidates.

The disbursements reported for Mark Kennedy on the 24 Hour reports dated 10/20/2006 and 10/26/2006 were added together for final payment. Also, the 24 Hour report dated 10/24/2006 is a duplicate of the 24 Hour report dated 10/26/2006 and should not have been reported.

There are two 24 Hour reports for Rick Santorum dated 10/19/2006 that were combinations of three separate disbursements. The 24 Hour report amount is shown and the corresponding three disbursement amounts are listed on the spreadsheet.

Your letter also requested clarification for disbursements made for member mailing-postage and member mailing-print & mail . These disbursements were internal communications to NRA members regarding non-federal candidates. Communication to our restricted class members that identified federal candidates were listed as memo entries on Schedule B supporting Line 29.

I can be reached at 703-267-1155 should you have any additional questions.

Sincerely,

Mary Rose Adkins  
Treasurer