

February 5, 2009

Ms Sylvette S. Garnes
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Amended August Monthly Report (7/1/08 - 7/31/08)
FEC ID# C00099259

Dear Ms Garnes:

In response to your letter dated January 7, 2009 requesting additional information:

1. Transfers received from the "Republican National Committee" were used for Party administrative and overhead expenses. They were not used for any exempt or nonallocable expenses on behalf of any specifically identified federal candidates.
2. The payments reported on Schedule B supporting Line 30(b) for "FEA: audio/video-gotv," "FEA: direct mail-voter reg" and "FEA: walk map printing-gotv" all represent generic campaign activity and do not promote, attack, support or oppose any specifically identified Federal candidate and do not constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure.
3. Payments to the original vendors for all reimbursements to individuals reported on Schedule B for "ITEMIZE: see-below-FEA:tent-vot reg" "ITEMIZE: see below-FEA:supply-V Reg," "ITEMIZE: see below-FEA: supplies-V Reg" and "ITEMIZE: see below-FEA: supp-vote reg" are not reported by memo entry because they do not aggregate \$200 or more in the calendar year.
4. All payments on Schedule H4 supporting Line 21(a) for "audio/visual equipment" were for generic use of the Committee. None of these expenditures were for a communication that referred to a clearly identified candidate for Federal office or that promoted, supported, attacked or opposed any such candidate for Federal office.
5. The negative disbursement from the "John McCain 2008" is not a voided check. It represents a reimbursement of expenses for use of copy machine, cleaning and cable expense utilized by representatives of the John McCain campaign. These operating expenses of the Committee were all paid by the Committee as administrative allocated activity, and therefore the reimbursement is recorded as such.
6. We have filed Amended reports prior to 7/1/08 that should clear up the problem with the allocated activity or event year-to-date totals for the Administrative category. The year-to-date amount of \$2,883,852.22 is correct as of 7/31/08 for the administrative category.
7. We have filed an Amended August Monthly Report to disclose the fundraising allocation ratio on Schedule H2.
8. We have filed an Amended August Monthly Report to clarify the description(s) for "merchant discount" on Schedule B. We have clarified the descriptions for "General Party consulting" and "gifts" on Schedule H4 also.
9. The expenditures reported on Schedule H4 to individuals for "rent" are not reimbursements to any individuals. These payments represent rent income to these individuals for space rented from them.

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ETEXT ATTACHMENT

Sincerely,

Abby F. Dupree, CPA
