



**Technology
Network**

RECEIVED
FEDERAL ELECTION
COMMISSION
Political Action Committees
Federal ID# C00328349 California ID# 970893

101 University Avenue, Suite 240 • Palo Alto, California 94301 • Telephone: 650.463.1501 • Facsimile: 650.463.1501 • e-mail: info@technetwork.org

August 11, 1998

VIA FEDERAL EXPRESS

Ms. Alicia K. Richardson
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: Technology Network Federal PAC, ID# C00328369

Dear Ms. Richardson:

On July 17 and 22, 1998, you mailed four letters to me as treasurer for the Technology Network Federal Political Action Committee regarding the public disclosure reports the PAC had filed. These four letters covered the Year End Report (1/1/97 - 12/31/97), the February Monthly Report (1/1/98 - 1/31/98), the March Monthly Report (2/1/98 - 2/28/98), the April Monthly Report (3/1/98 - 3/31/98), the May Monthly Report (4/1/98 - 4/30/98), and the June Monthly Report (5/1/98 - 5/31/98). I have decided to provide a single response to all four letters and will cover all issues you raise and include clarifying amendments where necessary.

USE OF CORPORATE RESOURCES

Your letters raise the issue of use of corporate resources in federal elections. You indicate that corporate resources can be used to pay the administrative costs of a corporation's separate segregated fund (PAC) and you indicate that use of corporate facilities for direct or in-kind contributions to federal candidates is strictly prohibited. In addition, you state that corporate officials may direct subordinates to plan, organize or carry out federal candidate, federal party and/or federal PAC fundraising as part of their work, using corporate resources, only if the corporation receives advance payment for the fair market value of the services.

Technology Network, an incorporated trade association, is keenly aware of this requirement and services of employees and consultants, as well as, use of facilities

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(telephone, computers, printers, copiers, etc.) are paid in advance by the Technology Network Federal PAC. At the time a federal fundraising event for a candidate, party committee or a PAC is agreed to, the Technology Network Federal PAC makes a \$200.00 advance payment to Technology Network. Technology Network staff and consultants, as part of their regular duties, are required to complete a weekly log of time spent on various federal fundraising events, fundraising events for California candidates, PACs and party committees, fundraising events for candidates, PACs and party committees in other states, policy roundtable meetings with federal, state and local officials, and non-fundraising events with public officials organized to enhance the flow of communication between the Technology industry and public officials.

Time spent on federal candidate, PAC or party activities is calculated and payment is made each week. At no time does the amount of time spent by employees or consultants exceed the advance originally made, thus all payments for these services are in advance.

CONDUIT CHECK DETAIL

You indicated that the committee did not disclose on the memo entries for Schedule A, the name of the candidate and on the memo entries for Schedule B the name of the contributor.

On the year end 1997 campaign statement and the February, March and April Monthly reports, conduited checks for various candidates and committees are listed as memo entries on Schedules A and B. The identification of the contributor and candidate or committee to which that individual has conduited a check is disclosed in an attachment to the campaign statement, which shows the name of the candidate/committee being supported and a list of contributors who conduited checks to that candidate/committee, including the date and amount of the check. Both Schedule A and B were clearly footnoted, directing the reader to the attachment.

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SCHEDULE D

You indicated that the committee was using a Schedule D in a computer-generated format which has not been approved by the FEC. We apologize for this oversight and have amended Schedule D in all reports to appear on the Commission form.

You also asked if the Schedule D for the May and June Monthly reports related to activity reportable on Line 9 or Line 10. Again, through an inadvertent error on our part, Schedule D was listed as a debts owed by the committee (Line 10), rather than debts owed to the committee (Line 9). This error has been corrected on Schedule D and on the Summary Page of the May, June and July Monthly campaign reports.

The committee also failed to list the "purpose" of some of the debts owed on all reports. This has been amended.

SUMMARY PAGE, LINE 5, 1997 YEAR END REPORT

You asked that we provide the coverage dates of committee's activity on line 5 of the Summary Page for the 1997 year end report. We did disclose that the report covered the period 1/1/97 through 12/31/97. We have clarified that to indicate that the committee was formed 7/7/98.

MAY MONTHLY 1998 EARMARKED CONTRIBUTIONS

You asked the committee to clarify its earmarked contributions attributed to Roger B. McNamee. Our original report disclosed an earmarked contribution from Mr. McNamee to Senator Patty Murray on Schedule B, but inadvertently omitted the earmarked contribution on Schedule A. This has been amended.

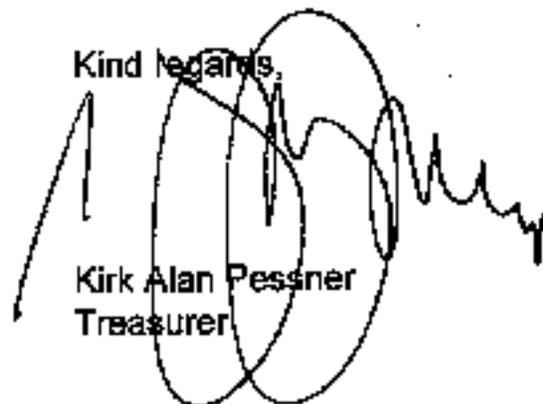
DISCLOSING IN-KIND CONTRIBUTIONS TO CANDIDATES/COMMITTEES

On the June Monthly 1998, you asked that we indicate the original payee and the amount paid and the in-kind contribution to the candidate's committee and the amount paid as a memo entry. We have amended the pages of the June Monthly report to reflect the example you provided and will use that example in the future.

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Reports Analysis Division
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August 11, 1998
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If you have any additional questions regarding our written responses or the amended reports, please do not hesitate to contact me directly at 650-401-8735.

Kind regards,

A handwritten signature in black ink, appearing to read "Kirk Alan Pessner", is written over the typed name and title. The signature is stylized and somewhat illegible due to overlapping loops.

Kirk Alan Pessner
Treasurer

Enclosures

LAW OFFICE OF
RUSSELL H. MILLER

20 PARK ROAD, SUITE E
BURLINGAME, CALIFORNIA 94010-4443

PHONE: (650) 401-8739
FAX: (650) 401-8739
E-MAIL: MILLPES9@WORLDNET.ATT.NET

RUSSELL H. MILLER
ATTORNEY AT LAW

KIRK ALAN PESNER
PARALEGAL/ADMINISTRATOR

August 11, 1998

VIA FEDERAL EXPRESS

Federal Election Commission
Public Records Office
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
AUG 13 9 36 AM '98

RE: Technology Network Federal Political Action Committee, C00328369

Dear Filing Official:

Enclosed please find an amendment to the 1997 Year End Campaign Report, covering the period 1/1/97 through 12/31/97 for the above-captioned filer.

Please endorse the second copy of page one of the report and return it to us in the enclosed envelope provided.

If you have any questions, please do not hesitate to contact us.

Kind regards,

LAW OFFICE OF RUSSELL H. MILLER

cc: California

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

RECEIVED
FEDERAL ELECTION
COMMISSION
AUG 13 9 36 AM '98

1. NAME OF COMMITTEE (in full) Technology Network Federal Political Action Committee	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 101 University Avenue, Suite 240	
CITY, STATE and ZIP CODE Palo Alto, CA 94301	
	2. FEC IDENTIFICATION NUMBER C000328369
	3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report
- Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31
- Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
- Thirtieth day report following the General Election on _____
 in the State of _____

(b) Is this Report an Amendment? YES NO ** Committee formed 7/7/98

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1/1/97**</u> through <u>12/31/97</u>		
6. (a) Cash on Hand January 1, 19 <u>97</u>		\$ -0-
(b) Cash on Hand at Beginning of Reporting Period	\$ -0-	
(c) Total Receipts (from Line 19)	\$ 54,250.00	\$ 54,250.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 54,250.00	\$ 54,250.00
7. Total Disbursements (from Line 30)	\$ 24,434.92	\$ 24,434.92
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 29,815.08	\$ 29,815.08
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 6,921.43	For further information contact: Federal Election Commission 888 E Street, NW Washington, DC 20483 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Kirk Alan Pessner	
Signature of Treasurer	Date 8/11/98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full) Technology Network Federal Political Action Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Friends of Senator D'Amato Post Office Box 888 Mineola, NY 11501	-0-	3353.18	-0-	3353.18
Nature of Debt (Purpose): Fundraising Expenses				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Friends of Rick White Post Office Box 8156 Kirkland, WA 98034	-0-	553.33	-0-	553.33
Nature of Debt (Purpose): Fundraising Expenses				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A Lot of People Supporting Tom Daschle Post Office Box 1656 Aberdeen, SD 57401	-0-	200.00	200.00	-0-
Nature of Debt (Purpose): Fundraising Expenses				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Friends of Chris Dodd Post Office Box 331133 Hartford, CT 06133	-0-	200.00	-0-	200.00
Nature of Debt (Purpose): Fundraising Expenses				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Leahy for U. S. Senator Committee Post Office Box 53 Burlington, VT 05402	-0-	544.30	-0-	544.30
Nature of Debt (Purpose): Fundraising Expenses				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor New Republican Majority Fund 228 S. Washington Street, Suite 200 Alexandria, VA 22314	-0-	2270.62	-0-	2270.62
Nature of Debt (Purpose): Fundraising Expenses				
1) SUBTOTALS This Period This Page (optional)				
2) TOTALS This Period (last page in this line only)				6921.43
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				6921.43

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt
8-13-98

First Class Mail POSTMARKED

Registered/Certified Mail POSTMARKED

No Postmark

Postmark Illegible

Received from the House office of Records and Registration Date of Receipt

Received from the Senate Office of Public Records Date of Receipt

Other (Specify): Postmarked
and/or Date of Receipt

Electronic Filing

Styl
PREPARER

8-13-98
DATE PREPARED