



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-5

David B. Drake, Treasurer
International Shipholding Corp. Political
Action Committee
650 Poydras Street, Suite 1700
New Orleans, LA 70130

FEB 21 2003

Identification Number: C00327122

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Drake:

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:

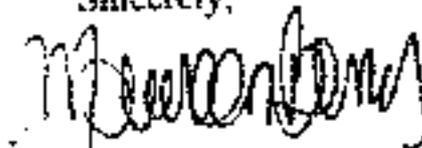
-Schedule B supporting Line 23 of your report discloses a contribution(s) to Mainstream America PAC, Reform PAC and Landricu-Cleland Joint Account PAC; however, you have disclosed "John Breaux," "Jerry Weller," and "Max Cleland," respectively, in the purpose of disbursement field(s). Please clarify whether this was an earmarked contribution(s) made by your committee through Mainstream America PAC, Reform PAC and Landricu-Cleland Joint Account PAC to these candidates, or if you made the contribution to the political committee exercising no direction or control over how the funds were to be used. If the latter is the case, please do not include the candidate's name in the purpose of disbursement field. Please amend your report to clarify the ultimate recipient of this contribution(s).

-For future filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity may be omitted.

-Your committee has filed a report that contains financial activity already disclosed on another report. Overlapping coverage dates create difficulties in accounting for cash flow from one report to another. Please amend this report by including only the financial transactions that occurred between 8/9/02 and 9/30/02. 2 U.S.C. §434(b)

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments (to include statements, designations, and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Maureen Benitz
Campaign Finance Analyst
Reports Analysis Division

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