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October 14, 2009

Via Federal Express

Mr. Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Tidewater Inc., Political Action Committee ID No. C00199471
FEC correspondence dated 09/25/2009

Dear Chris:

In response to the FEC's letter dated 09/25/09, I enclose a copy of the refund request made to Senator Vitter's campaign committee.

The refund request was required pursuant to 11 CFR § 110.2 (b). When the refund is received from the campaign committee, it will be disclosed on the appropriate report per FEC instruction.

Sincerely,

Quinn Fanning
Treasurer

29030172542



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October 14, 2009

Via Federal Express

Attn: Beth Bender
Senator David Vitter
6577 General Diaz Street
New Orleans, LA 70124

Re: Tidewater Inc., Political Action Committee ID No. C00199471
FEC correspondence dated 09/25/2009

Dear Ms. Bender:

On September 30, we received correspondence from the FEC informing us that the Tidewater PAC made contributions to Senator Vitter's campaign committee that did not fall within contribution limits. Two contributions were made to the Primary election. One contribution was for \$3,000.00 and the other for \$5,000.00. The excess amount made to the Primary election is \$ 3,000.00.

In order to comply with FEC rules (11 CFR § 110.2(b)) please refund the excess amount of \$3,000.00 to the Tidewater PAC. Upon receipt of the refund, a contribution may then be made pursuant to FEC rules.

Please feel free to contact me to discuss this matter at your earliest convenience.

Sincerely,

Quinn Fanning
Treasurer

TIDEWATER INC.
Pan-American Life Center
6020 Reynolds Street, Suite 1900
New Orleans, Louisiana 70130-6040
Telephone: (504) 568-1010

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 2009

Quinn Fanning, Treasurer
Tidewater Inc. Political Action Committee
601 Poydras Street
Suite 1900
New Orleans, LA 70130-6040

Response Due Date:
October 30, 2009

Identification Number: C00199471

Reference: Mid Year Report (1/01/09-6/30/09)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following item:

- Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

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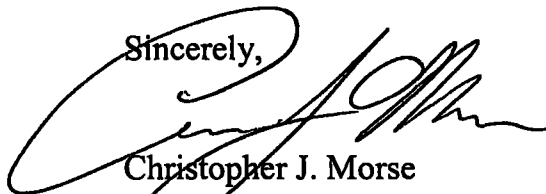
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,



Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division

Excessive Contributions

Recipient Name	Date	Amount	Election	Report
David Vitter for US Senate	3/31/08	\$3,000	Primary	2008 April Quarterly
David Vitter for US Senate	2/20/09	\$5,000	Primary	2009 Mid Year

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt

USPS First Class Mail Postmarked

USPS Registered/Certified Postmarked (R/C)

USPS Priority Mail Postmarked
 Delivery Confirmation™ or Signature Confirmation™ Label

USPS Express Mail Postmarked

Postmark Illegible

No Postmark

Overnight Delivery Service (Specify): *Fed Ex* Shipping Date
10/14/09
 Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

ED *10/15/09*
 PREPARER DATE PREPARED

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