

May 3, 2006

Via Electronic Submission

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: PUTNAM INVESTMENTS INC PUBLIC AFFAIRS COMMITTEE, C00289595

Dear Ms. Lewis

We are in receipt of your letter dated April 21, 2006 in which you state that inadequate disclosure was provided for the itemized individuals listed on Schedule A. In your conversation with Mark Ward of Skadden, Arps (acting on our behalf), you mention that the abbreviations provided for the itemized individuals' occupations were initially thought to be insufficient.

Pursuant to your advice, we are submitting this Form 99 as a response to help clarify such abbreviations.

Please note that, in the financial services industry, there are many widely used and accepted abbreviations relating to the occupations of people employed there-in. Detailed below are the descriptions of the few used by the Committee in its report. Also, per your advice, we are notifying you via this Form 99 that the Committee will continue to use these industry-standard abbreviations on its future reports:

MD - Managing Director
SVP - Senior Vice President
CEO - Chief Executive Officer
SMD - Senior Managing Director
AVP - Assistant Vice President

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions or if I can offer any further clarification.

Sincerely,

Joseph P. Petitti
Treasurer
