

May 27, 2009

Kaitlin Eger
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Franken Recount Fund (C00457119)

Dear Ms. Eger:

This is in response to your letter dated May 15, 2009, concerning the Year End Report (11/25/08 ? 12/31/08) of the Franken Recount Fund (the "Committee").

You ask about the absence of payments for administrative expenses. The Committee has no office space or employees, and so incurs no expenses for rent, utilities, salaries, telephone service, office equipment or supplies.

You also ask about the inclusion of receipts and disbursements on lines 17 and 29, respectively, instead of on lines 11 and 21. The Committee raises funds solely to finance recount activities. In Advisory Opinion 2006-24, the Commission advised that recount activities must be reported by authorized committees as ""other receipts"" and ""other disbursements.""

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours, Thomas Borman Treasurer
