

Federal Election Commission Inquiry, July 28, 2004

Democratic Party of Wisconsin
Identification Number: 000019331

Response Due Date: August 27, 2004

Attn: Maureen Benitz, Campaign Finance Analysis, Reports Analysis Division

The Democratic Party of Wisconsin has filed an amended June Monthly Report (5/1/04-5/31/04) to address questions raised with the above referenced inquiry - FEC-132821.

Additionally:

Question: Schedule A supporting Line 17 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee.Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged.

Response: The Democratic Party of Wisconsin (DPW) did assess the usual and normal charge for the goods and/or services provided to the purchasing entities. Consistent with FEC Advisory Opinion 2002-14, the DPW mailing list has been developed over a period of time, has a unique nature, and does not constitute merely a list or lists that were purchased from other sources. The DPW ascertains fair market value, consistent with it's understanding of similar commercial products, and then enters into a bona fida, contractual, arm's length transaction with the purchaser - with consistent pricing for similar product. The DPW, valuing it's list, did not provide the goods and/or services at less than the usual and normal charge, and therefore concludes that no contribution has occurred.