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October 31, 2014

Jill Sugarman
Senior Campaign Finance & Review Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C90013145

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Senior Campaign Finance & Review Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Sugarman:

I write in response to your September 30, 2014 Request for Additional Information to the U.S. Chamber of Commerce (C90013145) regarding its July Quarterly Report of Independent Expenditures for 2014. You raise two points.

First, your letter notes that "no contributions are disclosed on Line 6, "Total Contributions," and that "[e]ach contributor who made a donation in excess of \$200 to further the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information." You request that the organization amend its report to include this information.

As we have previously pointed out in response to similar letters from you, the U.S. Chamber understands the applicable FEC reporting regulations and requirements and its July Quarterly Report fully complies with those requirements. Per the FEC's regulations, filers are required to provide "the identification of each person who made a contribution in excess of \$200 to the person filing such report, which contribution was made for the purpose of furthering the reported independent expenditure." 11 CFR 109.10(e)(1)(vi) (emphasis added); see also Final Rules on Coordinated and Independent Expenditures, 68 Fed. Reg. 404, 413 (Jan. 3, 2003) ("reporting of independent expenditure contributors is limited to those who contributed specifically for independent expenditures"); Statement of Reasons of Chairman Petersen and Commissioners Hunter and McGahn in MUR 6002 (Freedom's Watch, Inc.) at 5 ("a donation must be itemized on a non-political committee's independent expenditure report only if such donation is made for the purpose of paying for the communication that is the subject of the report"). The U.S. Chamber received no such contributions "made for the purpose of furthering" the reported independent expenditures.

Please note that if the U.S. Chamber receives any contributions that are required to be reported pursuant to 11 CFR 109.10(e)(1)(vi), those contributions will be so reported. The omission of contributor information on future reports should not be assumed to be an oversight.

Second, you request clarification about the dates of independent expenditures made in support of Thad Cochran. We disclosed two such expenditures in support of Sen. Cochran on the July Quarterly Report. Each had also been disclosed on its own 24 hour report. One was filed on 6/13/14 in the amount of \$500,000, and one was filed on 6/19/14 in the amount of \$200,000. We assume you are questioning the expenditure disclosed on the July Quarterly Report with a date of 6/19/14. The transaction code for this expenditure is 57498787, and it is the same expenditure disclosed on the corresponding 24 hour report with the same transaction code. The amounts and description

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are the same; however, a typo resulted in an incorrect disbursement date on the July Quarterly Report. Today we are also filing an amendment to the July Quarterly Report to make this single correction. No activity was omitted from the July Quarterly Report, nor did we fail to file any 24 hour reports during the period.

We trust that the above explanation and corresponding amended report adequately answers your request.

Sincerely,

Ryan Meyers
