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November 20, 2006

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

Re: NARAL Pro-Choice America PAC
FEC ID No. C00079541

Dear Ms. Lewis:

This is in response to your letter dated October 18, 2006, concerning the September Monthly Report (8/1/06 - 8/31/06) of the above referenced Committee.

You inquire about expenditures for "Telemarketing Services" and "Printing," and whether these expenses constituted either in-kind contributions or independent expenditures. These expenses were for the Committee's fundraising efforts. They do not constitute in-kind contributions, and they did not contain express advocacy as defined under 11 C.F.R. 100.22 and were therefore not independent expenditures.

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,

Ezra W. Reese
Counsel to NARAL Pro-Choice America PAC
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