

February 17, 2009

Ms Sylvette S. Garnes
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: October Monthly Report (9/1/08 - 9/30/08)
FEC ID# C00099259

Dear Ms Garnes:

In response to your letter dated January 14, 2009 requesting additional information:

1. The receipt of \$45,150 from "John McCain 2008" reported on Schedule A Line 15 represents a reimbursement for direct mail expenses paid to The Stoneridge Group LLC on 10/7/08 and reported on the Pre-General Report, Schedule B, supporting line 30(b).
2. We have filed an amended October monthly report to clarify the receipt(s) reported from "Campaign Account for John L. Mica," and "Tom Feeney for Congress" - these were transfers of surplus funds and are now reported on Schedule A supporting Line 12. The receipt from "Putnam for Congress" is reported as a contribution.
3. Payments to the original vendors for all reimbursements to individuals reported on Schedule B for "FEA: maps & table-voter reg" are not reported by memo entry because they do not aggregate \$200 or more in the calendar year.
4. The payments reported on Schedule B supporting Line 30(b) for "FEA: walk map printing-gotv," "FEA: audio/visual-gotv," "FEA: direct mail-gotv" and "FEA: direct mail-voter reg" all represent generic campaign activity and do not promote, attack, support or oppose any specifically identified Federal candidate and do not constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure.
5. All transfers for allocated activity for the MD-08 account were made within the 70-day time period as required. The transfers from the non-federal account reported on Line 18(a) Column A for the MD-08 account for the 7/1/08-7/31/08, 8/1/08-8/31/08 and 9/1/08-9/30/08 reports totals \$385,445.92 and is for activity reported on Line 21(a)(ii) Column A for 6/1/08-6/30/08, 7/1/08-7/31/08 and 8/1/08-8/31/08. The transfer of \$84,567.41 reported on the 7/1/08-7/31/08 report was for the MD-08 non-federal share of expenses reported on Line 21(a)(ii) Column A for the period of 6/1/08-6/30/08.
6. All payments on Schedule H4 supporting Line 21(a) for "advertising" were for generic use of the Committee. None of these expenditures were for a communication that referred to a clearly identified candidate for Federal office or that promoted, supported, attacked or opposed any such candidate for Federal office.
7. Transfers received from the "Republican National Committee" were used for Party administrative and overhead expenses. They were not used for any exempt or nonallocable expenses on behalf of any specifically identified federal candidates.
8. The negative disbursements from the "John McCain 2008" are not voided checks. They represent reimbursements of expenses for use of copy machine, cleaning and cable expense utilized by representatives of the John McCain campaign. These operating expenses of the Committee were all paid by the Committee as administrative allocated activity, and therefore the reimbursement is recorded as such.

ETEXT ATTACHMENT

9. We have filed an Amended September Monthly Report to clarify the description(s) for "merchant discount." The disbursements for "FEA: collaterals-McCain/Palin NonAll" reported on Schedule B represent bumper stickers, t-shirts and yard signs distributed by volunteers.

10. We have filed an Amended October Monthly Report to disclose the fundraising allocation ratio on Schedule H2.

11. The expenditures reported on Schedule H4 to individuals for "office rent" are not reimbursements to any individuals. These payments represent rent income to these individuals for space rented from them.

Sincerely,
Abby F. Dupree, CPA