

ETEXT ATTACHMENT

02/06/2004 15:21

February 6, 2004

Ms. Jennifer L. Powell
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington DC, 20463

Re: American Council of Life Insurers PAC ("ACLI-PAC"), C00147088
Response to Request(s) for Additional Information

Dear Ms. Powell:

This letter is a response to the FEC's three Requests for Additional Information dated January 7, 2004 ("RFAI") regarding ACLI PAC's July Monthly Report (6/1/03-6/30/03), Amended September Monthly Report (8/1/03-8/31/03), and October Monthly Report (9/1/03-9/30/03).

ACLI PAC uses an external software package that categorizes all receipts and disbursements, and which then also prepares our FEC filings. Apparently, the software had a default that classified many of our receipts from other political action committees as "Refunds of Contributions Made to Federal candidates and Other Political Committees" (FEC Form 3X, Line 16) instead of "Contributions (other than loans) From: (c) Other Political Committees (such as PACs)" (FEC Form 3X, Line 11c). We believe this default was corrected with an update of our software in late October 2003.

Your request for amended reports caused us to take a closer look at our reports for 2003. Upon further scrutiny, we discovered that a number of other PAC entries were defaulting to line 11(a)(i) "Contributions From Individuals (itemized)". At the same time, we compared our FEC compliance reports with the records kept by our accounting department and discovered bank fees that had not been reported.

We have filed amended reports per your request, and the refunds in question have been removed from line 16 and are now listed as contributions on line 11(c). We have also filed amended reports beginning with the March Monthly Report (2/1/03-2/28/03) through the December Monthly Report (11/1/03-11/30/03) which convey the corrected PAC entries and include bank fees incurred in 2003.

If there are any additional questions or concerns, please direct them to my attention by calling (202) 624-2325, or, in my absence, to the attention of our PAC Manager, Kate Smith, at (202) 624-2035.

Sincerely,

Richard I. Klein
Treasurer