

HUCKABY, DAVIS
AND ASSOCIATES

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SEP 24 1 02 PM '98

September 22, 1998

Mr. Neil Evans
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Dear Mr. Evans:

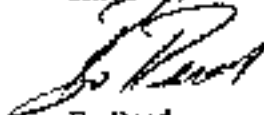
The Campaign For A New American Century Committee, FEC ID: C00281923, is in receipt of your letter dated 9/09/98 concerning our June 30, 1998 quarterly report.

Any cost, which is directly attributable to a federal election, is paid entirely from the federal account. The Committee uses the "funds expended" ratio based on an estimate of 1997-1998 federal/non-federal candidate contributions. The Committee amended its ratio in 1998 from 50/50 to 70/30 to reflect an increase in non-federal contributions. The Committee views administrative cost as any expense associated with the day-to-day operation of the PAC, which would not include fundraising nor direct candidate support.

The committee, from inception, has used "consulting" as a line item description of expenditures for consulting services received. Referring to CFR § 104(b)(3), the Federal Election Commission regulations make no reference to "consulting" as being a description that would not meet the requirements for reporting the purpose of an expenditure, nor do the Commission's instructions on the back of schedule H4.

If you have any questions please feel free to call 703 549 7705.

Sincerely,



Bo Reed
Consultant

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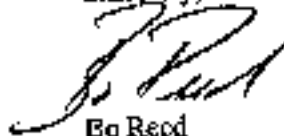
The Campaign For A New American Century Committee, FEC ID: C00281923, is in receipt of your letter dated 9/09/98 concerning our June 30, 1997 amended mid-year report.

The Committee allocates for administrative cost. The payments in question, to Alexander For President, are payments for insurance, as indicated on schedule H4, and are thus considered an administrative cost and allocated.

The committee, from inception, has used "consulting" as a line item description of expenditures for consulting services received. Referring to CFR §104(b)(3), the Federal Election Commission regulations make no reference to "consulting" as being a description that would not meet the requirements for reporting the purpose of an expenditure, nor do the Commission's instructions on the back of schedule H4.

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Bo Reed
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Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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