FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

November 25, 1998

Natalie Bierley, Treasurer
Principal Life Insurance Company Political
Action Committee
711 High Street - Tax Dept.
Des Moines, IA 50392

Identification Number: C00128918

Reference: September Monthly Report (8/1/98-8/31/98)

Dear Ms. Bierley:

This letter is to inform you that as of November 24, 1998 the Commission has not received your response to our request for additional information, dated November 4, 1998. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION RQ-2

WASHINGTON, D.C. 20463

Natalie Bierley, Treasurer
Principal Life Insurance Company Political
Action Committee
711 High Street - Tax Dept.
Des Moines, IA 50392

NOV 4 1998

Identification Number: C00128918

Reference: September Monthly Report (8/1/98-8/31/98)

Dear Ms. Bierley:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on

Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE B — ITEMIZED DISBURSEMENTS

For Line Number: 23

Name of Committee: PRINCIPAL LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE

Name Address Purpose of Disbursement	Date	Amount of Each Disbursement This Period
Boswell for Congress 709 Furnas Suite 1 Osceola, IA 50213		
Contribution to Leonard Boswell, House Candidate IA 3 Disbursement for: General Election-Federal	8/18/98	$500.00
Ganske for Congress 210 Walnut Suite 717 Des Moines, IA 50309		
Contribution to Greg Ganske, House Candidate IA 4 Disbursement for: General Election-Federal	8/18/98	$500.00
Grassley for Senate 521 East Locust Des Moines, IA 50309		
Contribution to Charles Grassley, Senate Candidate IA Disbursement for: General Election-Federal	8/18/98	$500.00
Osterburg for Senate P.O. Box 98 Mt. Vernon, IA 52314		
Contribution to Dave Osterburg, Senate Candidate IA Disbursement for: General Election-Federal	8/18/98	$500.00
TOTAL DISBURSEMENTS THIS PERIOD		$2,000.00

SCHEDULE B ITEMIZED DISBURSEMENTS

For Line Number: 23

Name of Committee: PRINCIPAL MUTUAL LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE

Name / Address / Purpose of Disbursement	Date	Amount of Each Disbursement This Period
Congressman Bart Gordon Committee 4491 MacArthur Blvd, NW Suite 201 Washington, DC 20007 Contribution to Bart Gordon, House Candidate TN 6 Disbursement for: General Election-Federal	3/2/1998	$1,000.00
Friends of Bob Graham 233 Constitution Avenue, NE Washington, DC 20002 Contribution to Bob Graham, Senate Candidate FL Disbursement for: General Election-Federal	3/10/1998	$1,000.00
Grassley Committee P.O. Box 6193 Alexandria, VA 22306 Contribution to Charles Grassley, Senate Candidate IA Disbursement for: General Election-Federal	3/2/1998	$1,000.00
Hastert for Congress Committee P.O. Box 625 Batavia, IL 60510 Contribution to Dennis Hastert, House Candidate IL 14 Disbursement for: General Election-Federal	3/10/1998	$1,000.00

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SCHEDULE B — ITEMIZED DISBURSEMENTS

For Line Number: 23

Name of Committee: PRINCIPAL MUTUAL LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE

Name / Address / Purpose of Disbursement	Date	Amount of Each Disbursement This Period
Friends of Bob Graham 233 Constitution Avenue, NE Washington, DC Contribution to Bob Graham, Senate Candidate FL Disbursement for: General Election-Federal	9/4/1997	$500.00
Embassy Club 801 Grand Avenue Suite 4000 Des Moines, IA 50309-2762 In-kind contribution to Charles Grassley, Senate Candidate IA Disbursement for: General Election-Federal	8/18/1997	$335.30
Grassley Committee P.O. Box 6193 Alexandria, VA 22306 Contribution to Charles Grassley, Senate Candidate IA Disbursement for: General Election-Federal	11/20/1997	$1,000.00
KOMPAC P.O. Box 422 Yorkville, IL 60560 Contribution to Dennis Hastert, House Candidate IL 14 Disbursement for: General Election-Federal	7/21/1997	$1,000.00

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SCHEDULE B ITEMIZED DISBURSEMENTS

For Line Number: 23

Name of Committee: PRINCIPAL MUTUAL LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE

Name / Address / Purpose of Disbursement	Date	Amount of Each Disbursement This Period
Grassley Committee 721 Federal Building 210 Walnut Street Des Moines, IA 50309 Contribution to Charles Grassley, Senate Candidate IA Disbursement for: General Election-Federal	6/26/97	$1,000.00
Grassley Committee, Inc. 4010 Franconia Road Alexandria, VA 22310-2136 Contribution to Charles Grassley, House Candidate IA Disbursement for: General Election-Federal	1/24/97	$1,000.00
Judd Gregg Committee P.O. Box 1812 Concord, NH 03302 Contribution to Judd Gregg, Senate Candidate NH Disbursement for: General Election-Federal	3/7/97	$1,000.00
Judd Gregg Committee P.O. Box 1812 Concord, NH 03302-1812 Contribution to Judd Gregg, Senate Candidate NH Disbursement for: General Election-Federal	1/20/97	$1,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

For Line Number: 23

Name of Committee: Principal Mutual Life Insurance Company Political Action Committee

Name Address Purpose of Disbursement	Date	Amount of Each Disbursement This Period
Friends of Newt Gingrich 1085 Holcomb Bridge Road Suite 190A Roswell, GA 30076 Contribution to Newt Gingrich GA 6 Disbursement for: General Election-Federal	2/3/95	$1,000.00
Friends for Slade Gorton 11027 NE 4th Bellevue, WA 98004 Contribution to Slade Gorton WA Disbursement for: Primary-Federal	2/24/95	$1,000.00
Lindsey Graham for Congress c/o DaVinci 1122 Fifth Street, NW Washington, DC 20001 Contribution to Lindsey Graham SC 3 Disbursement for: Primary-Federal	2/10/95	$500.00
Grassley Committee, Inc. 4010 Franconia Road Alexandria, VA 22310 Contribution to Charles Grassley IA Disbursement for: General Election-Federal	1/20/95	$1,000.00