



FEDERAL ELECTION COMMISSION
WASHINGTON, D. C. 20463

RQ-2

Gary Ruffner, Treasurer
Utility Workers Union of America
Political Contributions Committee
815 16th Street, NW, Room 605
Washington, DC 20006

Identification Number: C00040741

MAR 29 2000

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Ruffner:

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 discloses a loan from your committee to UWUA MASS PAC in the amount of \$1,100; however, this figure has been omitted from Line 9 of the Summary Page and a Schedule C has not been provided. Loans must be continuously reported until they are either repaid or settled. 11 CFR §104.3(d) Please amend your report by disclosing this figure on Line 9 of the Summary page and providing a Schedule C.

Furthermore, please be aware that according to 11 CFR §100.7(a)(1)(i)(E), any loan made by a political committee is subject to the limitations outlined in 11 CFR part 110. While repayment of the principle amount of such a loan is not considered a contribution by the debtor to the lender committee, the repayments must be comprised of permissible funds subject to the prohibitions of 11 CFR §110.4(a) and Part 114.

-Please amend Schedule B supporting Line 23 by providing the full name, election designation and office sought including state and congressional district, if applicable, for each contribution made to a federal candidate or political committee. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please

note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to Alarcon, Richard Senate and Polanco, Richard Senate. Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Operating expenditures should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report includes computer produced formats of Schedules A and B. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

If the software your committee is using to produce the Schedules of the FEC FORM 3X does not allow you to electronically file your report, you may want to call the vendor who produced your software to inquire about the availability of a software upgrade that includes electronic filing. A number of commercial software companies have added electronic filing capability to their products. A list of these companies is available on the FEC web site, <http://www.fec.gov>.

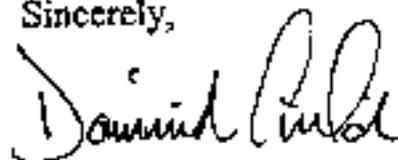
Alternatively, freeware (FECfile) available from the FEC, can help you complete and file your reports electronically. It installs easily, computerizes

every schedule in the FEC FORM 3X, contains features to help you avoid common errors, allows you to file electronically, and has free technical support for your questions. You may obtain your free copy by downloading FECfile from our web site, <http://www.fec.gov>, or by calling the Electronic Filing Office at (202) 694-1307.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00040741, to avoid potential errors in entering your reports onto the public record.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

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