

Dear Mr. Jones:

Common Sense Issues, Inc. (?CSI?), a qualified nonprofit corporation, has received the Request for Additional Information (?RFAI?) from your office, dated July 17, 2008, regarding the Amended 2008 April Quarterly Report (?the Report?). John Lind, Treasurer of CSI has forwarded the RFAI to me for response.

You have inquired regarding itemization of schedule E information on the Report, and have requested that we amend the Report to include ?the state presidential primary for which these expenditures were made.?

When CSI initially attempted to electronically file the required Report, I contacted the Federal Election Commission (?FEC?) and actually spoke to you regarding this very issue. You advised me at the time that it was unnecessary to include the state of election information when reporting independent expenditures made in support of or opposition to presidential candidates. After CSI received the RFAI, I contacted you again as CSI?s FEC analyst, and you indicated that you recalled our earlier conversation, but that new internal policies had been implemented since we last spoke, and the state of election information was now required.

Yesterday, I attempted to amend the Report to include the state of election information, but the FEC?s ?FEC file? software would not permit me to enter the information. I contacted Ken Lally, (Project Manager/Program Coordinator in the FEC?s Electronic Filing Office), who advised me that the software doesn?t allow for this information to be entered because it was not previously required, and further noted that there seems to be a discrepancy between the software and the new internal policies.

Thus, CSI is filing this response today in lieu of an amendment because, while the law requires CSI to file electronically, the FEC software does not permit an amendment to be filed disclosing information now being requested from the FEC.

When filing the initial Report, CSI believed that it had properly disclosed all required information in compliance with regulations promulgated by the FEC regarding reporting of independent expenditures pursuant to 11 C.F.R. ?109.10(e). Nowhere in the regulation is there a requirement that the state of election for independent expenditures supporting or opposing presidential candidates be reported. Notwithstanding that fact, CSI would amend its report if the FEC filing software allowed for such information to be added to the report. We are at something of a loss as to how we are to proceed from this point forward.

Please contact me at (202) 672-5513 if you have suggestions as to how to respond to the request contained in your July 17, 2008 letter for CSI to amend its report.

Sincerely,

Jessica C. Furst, Esq.
Counsel, Common Sense Issues, Inc.
