



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

October 1, 1998

Ruth Harrison, Treasurer
Campaign For A New American Century
1922 West End Avenue, 2nd Floor
Nashville, TN 37203

Identification Number: C00281923

Reference: Amended Mid-Year Report (1/1/97-6/30/97) dated 12/3/97

Dear Ms. Harrison:

On September 9, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your September 22, 1998 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-In your letter dated September 22, 1998, you state that the insurance payments made to Alexander for President represent administrative costs and thus allocated between your federal and non-federal accounts. Please clarify the circumstances whereby your committee is paying for its insurance through Alexander for President rather than paying the insurance company itself. Your explanation should include whether there is a benefit accrued to either committee by handling the insurance payments in this manner.

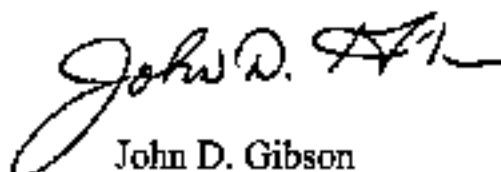
-You state that "from inception, [you have] used 'consulting' as a line item description of expenditures for consulting services received" and that the regulations "make no reference to 'consulting' as being a description that would not meet the requirements for reporting the purpose . . .". Please note that the purposes listed at 11 CFR 104.3(b)(3) are provided as examples only, and are not meant to be inclusive. Purposes should be concise, yet specific enough to provide clear descriptions as to why

disbursements were made. It appears that the term "consulting" could be disclosed with a more descriptive purpose. Please review those disbursements which are currently described as such and amend those which require a more specific description.

If this information is not received by the Commission 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 related to this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson". The signature is written in a cursive style with a large, sweeping initial "J".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

