



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 12, 2008

Nathaniel LaCour, Treasurer
American Federation of Teachers AFL-CIO
Committee on Political Education
555 New Jersey Avenue NW
Washington, DC 20001

**Response Due Date:
April 11, 2008**

Identification Number: C00028860

Reference: Year End Report (7/1/07-12/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following item:

-Schedule B, supporting Line 23 of your report discloses a disbursement totaling \$300,000 to "AFL-CIO COPE PCC ACCOUNT." In response to an inquiry made by the Commission regarding the relationship between American Federation of Teachers AFL-CIO Committee on Political education (AFT COPE) and AFL-CIO COPE PCC, AFL-CIO COPE PCC stated in a miscellaneous electronic submission, received 8/18/06 that "these two committees are not affiliated" and that "AFT COPE and its connected sponsoring organization, the American Federation of Teachers, act as collecting agents for AFL-CIO COPE PCC." It is further explained that "AFT/AFL-CIO members authorize joint contributions to AFT's separate segregated fund, AFT COPE, and the AFL-CIO's separate segregated fund, AFL-CIO COPE PCC, via payroll deductions. These contributions are collected by participating employers signatory to AFT collective bargaining agreements in accordance with 11 C.F.R. § 114.5 and remitted to AFT COPE, which then transfers a portion of the contributions to AFL-CIO COPE PCC." The response appears to demonstrate that AFT COPE could legally function as a collecting agent. However, AFT COPE has not demonstrated that it has acted in a manner consistent with being a collecting agent under the Commission's regulations for the amounts transferred to AFL-CIO COPE PCC. To fulfill the requirements, AFT

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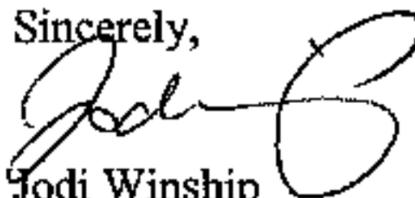
COPE must transmit contributions to AFL-CIO COPE PCC within 10 or 30 days, have a transmittal account solely for AFL-CIO COPE PCC contributions or keep separate records of all receipts and deposits, forward all contributor identification information, and retain the required records for three years. 11 CFR §§102.6(c)(4), 102.6(c)(5), 102.6(c)(6), 102.8 Further, AFT COPE would need to report the transfer of funds to AFL-CIO COPE PCC, which would in turn be required to report the full amount of each contribution received from the original contributor. 11 CFR §102.6(c)(7)

You are advised to implement changes in your procedures in order to comply with the provisions of 11 CFR §§102.6(c) and 102.6(b)(1). Although the Commission may take further legal action regarding the failure to adhere to the requirements of a collecting agent, your prompt action in changing your procedures will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1136.

Sincerely,



Jodi Winship

Senior Campaign Finance Analyst
Reports Analysis Division

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