



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Gary Fields, Treasurer
ABA BankPAC
1120 Connecticut Avenue NW
Washington, DC 20036

JAN 4 2002

Identification Number: C00004275

Reference: July Monthly (6/1/01-6/30/01), August Monthly (7/1/01-7/31/01) and
September Monthly (8/1/01-8/31/01) Reports

Dear Mr. Fields:

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 A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of the deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments 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 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,

A handwritten signature in cursive script that reads "Alice Kang".

Alice Kang
Reports Analyst
Report Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedules for each category of the Detailed Reporting Page	PAGE NUMBER		PAGE	OF
Any information copied from other reports and statements may not be suitable for use by any person for the purpose of soliciting contributions or for promotional purposes, other than using the name and address of any political committee to solicit contributions from such persons.		24	25	26	27	28
NAME OF CONTRIBUTOR (or Fee)		Critical Reason Inc. PAC				
Full Name (Last, First, Middle Initial)		Kurt J. Pymanuel				
Mailing Address		3 Critiques Ave				
City		State		Zip Code		
Kingsburg		VA		22383		
FEC ID number of contributing federal political committee		C				
Name of Employer		Critical Reason Inc.				
Occupation		Executive Officer				
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (describe) *		Aggregate Year-to-Date**		Amount of Each Receipt (Use Period)		
		285.00		90.00		
				(\$15 biweekly) ^a		

*Adding Extra Text/Explanation: When using FECfile's electronic filing software, this information can be entered using the "memo text" window. To make a "memo text" entry, select the "View" menu on the FECfile toolbar. Select "All Transactions." Single click (highlight) the transaction to which the "memo text" will be attached. Then select the "Edit" menu on the toolbar and select "memo text."

**When using FECfile's electronic filing software, enter this information in the "description" field.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, type "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.B(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(i) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

