



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-3

January 9, 2003

Stephen E. White, Treasurer
Delta Dental Plans Association PAC (DELTAPAC)
1515 W 22nd Street, Suite 1200
Oak Brook, IL 60523

Identification Number: C00213819

Reference: Mid-Year (1/1/01-6/30/01) and July Quarterly (4/1/02-6/30/02) Reports

Dear Mr. White:

This letter is to inform you that as of January 8, 2003 the Commission has not received your response to our requests for additional information dated December 18, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by January 29, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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, please contact Maureen Benitz on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Stephen E. White, Treasurer
Delta Dental Plans Association PAC (DELTAPAC)
1515 W 22nd Street, Suite 1200
Oak Brook, IL 60523

Identification Number: C00213819

DEC 18 2002

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. White:

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:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30

DELTA DENTAL PLANS ASSOCIATION PAC (DELTAPAC)

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days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))

The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purpose of transmitting contributions to a separate segregated fund. A collecting agent may be, but is not limited to, a committee which is affiliated with the separate segregated fund; the connected organization; or a local, national, or international union.

Funds received from a collecting agent are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR §104.3(a). If the amounts in question were contributed by individuals and transmitted to your committee by a collecting agent, the activity should be included on Line 11(a)(j) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report.

DELTA DENTAL PLANS ASSOCIATION PAC (DELTAPAC)

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If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received funds from an entity which was not serving as a collecting agent, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

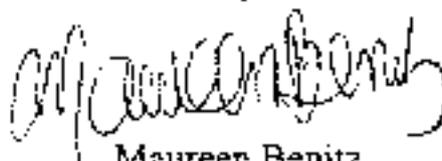
If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A response or 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. 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 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,



Maureen Benitz
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 7 of 28

(check only one)
 11a 11b 11c 12
 13 14 15 16 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Delta Dental Plans Association - DeltaPAC

A. Full Name (Last, First, Middle Initial)
 Date of Receipt
 M M / D D / Y Y Y Y
 03 / 09 / 2001

Mailing Address
 P.O. Box 828
 City State Zip Code
 Stevens Point WI

FEC ID number of contributing federal political committee. Amount of Each Receipt this Period
 1000.00

Name of Employer Occupation
 Board of Directors

Receipt For: Aggregate Year-to-Date
 Primary General
 Other (specify) 1000.00

Transaction ID: 10000000159700008 MB

B. Full Name (Last, First, Middle Initial)
 Date of Receipt
 M M / D D / Y Y Y Y
 03 / 09 / 2001

Mailing Address
 P.O. Box 828
 City State Zip Code
 Stevens Point WI 54481-0828

FEC ID number of contributing federal political committee. Amount of Each Receipt this Period
 600.00

Name of Employer Occupation
 Delta Dental Plan of Wisconsin President & CEO

Receipt For: Aggregate Year-to-Date
 Primary General
 Other (specify) 600.00

Transaction ID: 10000000159800009

C. Full Name (Last, First, Middle Initial)
 Date of Receipt
 M M / D D / Y Y Y Y
 03 / 26 / 2001

Mailing Address
 4 Longfellow Pl., 1509
 City State Zip Code
 Boston MA 02114

FEC ID number of contributing federal political committee. Amount of Each Receipt this Period
 600.00

Name of Employer Occupation
 Delta Dental Plan of Massachusetts President & CEO

Receipt For: Aggregate Year-to-Date
 Primary General
 Other (specify) 600.00

Transaction ID: 10000000161500010

SUBTOTAL of Receipts This Page (optional) ▶ 2200.00

TOTAL This Period (last page this line number only) ▶