

June 18, 2009

Mr. Allen Norfleet
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington DC 20463

Identification Number: C00449280

Dear Mr. Norfleet:

This letter responds to your letter dated June 3, 2009, regarding the Amended October Monthly Report (9/1/08-9/30/08), which Free and Strong America PAC, Inc. filed on November 4, 2008.

Our answers to your inquiries are as follows:

With respect to your first two inquiries, Free and Strong America PAC, Inc. is familiar with the rules governing goods and/or services provided by one committee to another. See 11 CFR s. 100.52(d)(1). As such, all payments for purchases and rentals are equal to the fair market value and the "usual and normal charge" for such goods and services. To determine the amounts charged by one committee to another for purchases and rentals, Free and Strong America PAC, Inc. consults with merchants, distributors, and vendors to determine the current market pricing for the goods or services in question. For instance, to calculate the value of donor lists and related assets, political list vendors and merchants specializing in the relevant goods were consulted. We are confident that this process (1) led us to charging the "usual and normal charge" for all goods and services sold to other committees and (2) led us to paying the "usual and normal charge" for all goods and services purchased from other committees.

With respect to your third inquiry, as you correctly note, Free and Strong America PAC, Inc. made expenditures for "Direct Mail Creative Fee[s]." These expenditures were related to the creation of PAC fundraising solicitations that did not contain express advocacy as defined under 11 CFR s. 100.22 or mention Federal candidates.

Thank you for your assistance on these matters. Please do not hesitate to contact us if you have any questions.

Sincerely,

Darrell Crate
Treasurer
