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May 12, 2008

Marlene R. Daughtrey
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Committee No. C00428094

Dear Ms. Daughtrey:

I am writing on behalf of IntegraPAC of Integra Telecom Holdings in response to your letter of April 11, 2008, attached, inquiring about the multicandidate status of IntegraPAC.

As we discussed, the connected organizations of IntegraPAC and Eschelon Telecom Inc. PAC (Committee No. C00409193) merged in 2007, resulting in the affiliation of the two PACs, which were themselves subsequently merged. Eschelon PAC had qualified as a multicandidate PAC in March 2007 and filed FEC Form 1M later that year. When the two PACs became affiliated, IntegraPAC qualified as a multicandidate PAC by virtue of its affiliation with Eschelon PAC. An amended Statement of Organization was filed by IntegraPAC on December 20, 2007 showing Eschelon PAC as affiliated.

Accordingly, IntegraPAC today filed FEC Form 1M indicating that it qualified as a multicandidate PAC on December 20, 2007 through its affiliation with Eschelon PAC.

If you have any questions or if we can provide any additional information, please let me know.

Sincerely,

William H. Minor

Attachment

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 2008

RQ-2

Russell C. Merbeth, Treasurer
IntegraPAC of Integra Telecom Holdings Inc.
3213 Duke Street, Suite 246
Alexandria, VA 22314

Response Due Date:
May 12, 2008

Identification Number: C00428094

Reference: February Monthly Report (1/01/08 – 01/31/08)

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:

-Your filings disclose that your committee may have satisfied the criteria set forth at 11 CFR §100.5(e)(3) for becoming a multicandidate committee; however, the Commission has no record of a FORM 1M (Notification of Multicandidate Status) filed by your committee. Please be advised that once a political committee meets the certification requirements or becomes affiliated with an existing multicandidate committee, whether or not that political committee has certified its status as a multicandidate committee, it automatically attains multicandidate status and must file a FORM 1M (Notification of Multicandidate Status) within ten (10) calendar days. The certification requirements for multicandidate status have been satisfied when a political committee:

1. Has received contributions for federal elections from at least 51 persons;
2. Has been registered with the Commission for at least 6 months; and
3. Has made contributions to at least five federal candidates.

For further guidance on the multicandidate certification requirements, please see 11 CFR §§102.2(a)(3), 110.2(a)(1) and (2). Please submit a FORM 1M to disclose the required information for the public record. A

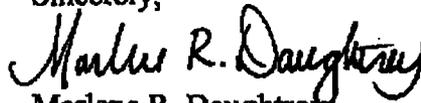
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copy of FEC FORM 1M can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413.

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) 694-1394.

Sincerely,



Marlene R. Daughtrey
Senior Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
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