

ETEXT ATTACHMENT

01/05/2005 15:06

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Ms. Abbie Hodgson, Analyst
Reports Analysis Division
Federal Election Commission

Dear Ms. Hodgson,

On behalf of the International Longshoremen's Association Committee on Political Education (ILA COPE), we file this Form 99 Miscellaneous Report in response to your RFAI inquiring about additional receipts reported on ILA COPE's amended April and July 2004 Quarterly reports. The additional receipts shown on the amended reports represent unitemized payroll deduction contributions from ILA members. These unitemized receipts were not reflected in the original report because of a routing delay in the transmission of certain account information from ILA's accountants to the persons responsible for preparing ILA COPE reports.

ILA COPE has already acted to address and resolve the source of the routing delay that necessitated the amendments by providing for the direct transmission of ILA COPE receipt information from ILA COPE's bank to the persons responsible for preparing ILA COPE's FEC reports. This step represents a part of on-going efforts by the ILA to streamline the transmission of information between relevant ILA departments, which effort has been made a priority since the completion of the FEC's audit of ILA COPE in 2004.

Finally, we note that the amount of the additional unitemized payroll deduction receipts in question represent a relatively small percentage of ILA COPE's total annual receipts. ILA COPE takes its reporting obligation seriously and is working diligently to improve its processes and procedures to ensure the accurate and timely reporting of all ILA COPE activity.

We appreciate your understanding in this matter and if you should have any additional questions or require additional information, please do not hesitate to contact me at (203) 254-3233.

Sincerely,

Corey Rubin
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