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December 18, 2014

VIA ELECTRONIC FILING
Federal Election Commission
Attn Nicole Miller
999 E Street N.W.
Washington, D.C. 20004

RE: Committee C00496372

Dear Ms. Miller:

Freedom Frontier Action Network (FFAN) files this statement to provide a response to your November 25, 2014, Request for Additional Information (RFAI) regarding the totals for Schedule E in the field Calendar Year-To-Date Per Election as it appeared on the 12 Day Pre-General Report and the RFAI's direction to amended such report.

FFAN used the FEC Election Commission's FEC Filing Software to timely and accurately report all independent expenditures related to the General Election for West Virginia, District 2, House of Representatives seat. These independent expenditures are reflected on FFAN's filings:

- Post-General Report (FEC-979021 filed 12/04/2014)
- Pre-General Report (FEC-963553 filed 10/21/2014)
- 24/48 Hour Notice (FEC-961520 filed 10/18/2014)
- 24/48 Hour Notice (FEC-958739 filed 10/15/2014)
- Oct Quarterly Report (FEC-958734 filed 10/15/2014)

In a telephone conference with you and Commission's Electronic Filing Office, on December 18, 2014, Shannon O'Leary of Gober Hilgers PLLC, counsel for FFAN, reviewed the functionality of the FEC Filing Software (Software) and its limitations with regard to totals for independent expenditures as they appear on Schedule E and the Detailed Summary.

Specifically discussed was the Software's functionality related to the creation of a transaction for an independent expenditure that is disseminated on a date prior to the date the committee issues payment to the vendors used in development, production and broadcast of the communication (IE vendors). As it was reviewed in the telephone conference:

1. A committee must report an independent expenditure based on the date the communication is disseminated (consistent with 11 CFR 104.4(b)(2) and (c) and 109.10(c) and (d)) and not based on the date the committee issues expenditure(s) to IE vendors.
2. If a committee has not issued an expenditure to IE vendors, the committee must report the transaction(s) on Schedule D as a debt and not on Schedule B.
3. Nevertheless, the Software does not permit the committee to add a transaction for debt from Schedule D to a 24/48 Hour Notice.
4. Therefore, in order prepare a 24/48 Hour Notice, the committee must create and use a memo entry on Schedule B, Line 24 and enter the known dissemination date but it should not enter any information in, i.e., leave blank, the Date of Dissemination.

While the above described procedure offers a work-around for the Software's report creation limitations, this procedure cannot compensate for the Software's tabulation limitations that impact the totals for the Detailed Summary Line 24, and Schedule E in the fields for Calendar Year-To-Date Per Election.

After review of these facts, you and Ms. O'Leary agreed that due to limitations in the Commission's Software, which are beyond FFAN's control, it is not possible for FFAN to amend the 12 Day Pre-General Report to reflect totals in certain

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fields as you requested in the RFAI at issue, and no such amendment is expected at this time.

Notwithstanding, FFAN strives to ensure that its reports remain consistent with the Commission's high standards for public disclosures. Therefore, FFAN provides in this statement the Calendar Year-To-Date Per Election totals as the totals would have appeared on Line 24 of the Detailed Summary and on Schedule E of FFAN's periodic reports if the Software did not have tabulation limitations:

- Post-General Report total \$119,740.80
- Pre-General Report total \$119,740.80
- Oct Quarterly Report total \$19,782.80

It is my hope this statement provides an adequate explanation for Schedule E independent expenditure totals for FFAN's reports. Please do not hesitate to contact me if you have any questions or need additiona
