

A-G7 9 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 1

Christopher Whyrick  
Senior Campaign Finance Analyst  
Reports Analysis Divison  
Federal Election Commission

Mr. Whyrick,

After receiving your letter and reviewing our records and reporting, we have made done the following:

1.We have added the independent expenditures from 10/19/2010, 10/21/2010, 10/22/2010, 10/25/2010, 10/26/2010, 10/27/2010, 10/28/2010, 10/29/2010 and 11/1/2010 that were missing to our 2010 year end quarterly report. Due to technical issues that our organization was having with the FECfile software, we initially began using the FEC webform to submit our 24 hour reports. However, while using the webform to submit our quarterly report, we encountered issues related to the volume of information we were trying to submit. After contacting the FEC Electronic Filing Office we were able to resolve the issues with FECfile and electronically file our quarterly report using the software. It is because of these issues that a few of our transactions unfortunately did not make it on to our quarterly report. This has been amended and will be filed electronically along with this response.

2.After reviewing the attachment regarding the independent expenditures that do not appear on 24-hour reports, we have come to the following conclusion:

Since these expenditures occurred on or after the election date of November 2, 2010 we did not believe we were required to file 24-hour reports as they were 'after the 20th day but no more than 24 hours before 12:01 am of the day of the election.' We reviewed the regulations with our lawyers at the time of the expenditures and filing and believe that we were not required to file 24 hour reports for these transactions.

If you require more information, or find our response inadequate, please let us know so that we can correct any mistakes or submit an additional response.

Sincerely,

Eboni Speight  
Finance Director  
USAction  
(202) 263-4529  
espeight@usaction.org

\*\*\*\*\*