

ETEXT ATTACHMENT

10/04/2002 10 : 20

October 3, 2002

Ms. Jane Parks
Campaign Finance Analyst
Reports Analyst Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Identification Number: C00039040

Reference: Mid-Year (1/1/01-6/30/01), Year End (7/1/01-12/31/01),
April Quarterly (1/1/02-3/31/02) and July Quarterly (4/1/02-6/30/02)
Reports

Dear Ms. Parks,

We have been advised by our FEC approved software provider, Grassos Software, Inc. that they believe the following response to your comments on our electronic filings are appropriate.

In support of your request that the Reports disclose aggregate year-to-date total for contributions received from individuals you reference 11 CFR 104.3(a)(4). As permitted by 11 CFR 104.3(a)(4), the Reports as filed indicate the final year-to-date contribution received from each contributor over the reporting threshold during the reporting period. 11 CFR 104.3(a)(4) permits, but does not require progressive payroll deduction figures:

"(4) Itemization of receipts for all political committees including authorized and unauthorized committees. The identification (as defined at Sec. 100.12 of this chapter) of each contributor and the aggregate year-to-date (or aggregate election-cycle-to-date, in the case of an authorized committee) total for such contributor in each of the following categories shall be reported.

(i) Each person, other than any political committee, who makes a contribution to the reporting political committee during the reporting period, whose contribution or contributions aggregate in excess of \$200 per calendar year (or per election cycle in the case of an authorized committee), together with the date of receipt and amount of any such contributions, except that the reporting political committee may elect to report such information for contributors of lesser amount(s) on a separate schedule."

In addition, your request that the Reports disclose the frequency and amount of each deduction you reference 11 CFR 104.8(b). As permitted by 11 CFR 104.8(b), the Reports as filed separately itemize each additional contribution received from each contributor over the reporting threshold during the reporting period. 11 CFR 104.8(b) permits, but does not require:

"In lieu of separate itemization, such committee may report: the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual; and a statement of the amount deducted per pay period."

The Committee has not elected to use the alternate means of reporting because of programming issues and the fact that deductions may vary between payroll periods. Accordingly, we believe the

ETEXT ATTACHMENT

Reports filed comply with the reporting requirements.

We assume, given the large number of filings done with Gnosso Software (Keep In Touch), that you will want to communicate in writing to both us and them your official position as reprogramming may be required.

We hope this information clarifies the matters referred to in your letter. Please do not hesitate to contact Gnosso Software and me if you would like to discuss this matter further.

Sincerely,

Deborah K. Jones
Government Relations Administrator
Treasurer Whirlpool Corporation Political Action Committee

cc:Γ Attn: Karen
Gnosso Software, Inc.
□ 1720 I Street, NW, Suite 510
□ Washington, DC 20006
□ Phone: 202/463-1200, ex. 9