ETEXT ATTACHMENT

08/19/2005 11 : 11

August 18, 2005

Mr. Bradley Decker
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: American Hospital Association PAC
FEC ID No. C00106146

Dear Mr. Decker:

This is in response to your letter dated August 3, 2005 concerning the July Monthly Report (6/1/05-6/30/05) of the above referenced Committee.

You ask about an expenditure for "polling services" made by the American Hospital Association PAC (the "Committee") and whether the expenditure constituted an in-kind contribution or an independent expenditure. The polling services purchased by the Committee were provided to the Congressman Gerlach's committee as an in-kind contribution, which the Committee reported on Schedule B, Line 23. Since the Committee provided the polling results to the candidate between 16 and 60 days after the initial receipt, it valued the in-kind contribution at 50% of the original value. (11 C.F.R. 106.4) Pursuant to instructions from a previous reports analyst, the Committee disclosed the entire cost of the polling services on Line 21b. Then on the date it provided the polling results to the candidate it subtracted the in-kind amount from Line 21b and transfered it to Line 23, along with the candidate committee information and a note referencing the new location. The Committee has used the same reporting method for many years.

You also ask about identification numbers for contributions disclosed on Line 23. The political committee identification numbers are provided to the Committee by its software vendor with its database, but in the future the Committee will check these numbers to ensure their accuracy.

We hope that this information adequately answers your questions. If you have any additional questions, please contact the Committee.

Very truly yours,

Melinda Hatton
Treasurer