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November 3, 1998

Antoinette Kitchen
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Identification Number: C00073155
Reference: July Quarterly Report (4/1/98-6/30/98)

Dear Ms. Kitchen:

KeyPAC recently received a letter from you regarding your review of the above referenced report. The following is our response to your concerns:

- Schedule B supporting Line 23 discloses a contribution to the Republican Senate Council. This is a separate fund of the Republican Senate Campaign Committee, Tax ID# 530188336, FEC ID# C000027466 which is a registered committee with the Commission.
- To the best of my knowledge, Schedule B itemizes the appropriate committees with transfers supporting Line 22, federal committees supporting Line 23, and non-federal committees supporting Line 29 of the Detail Summary.
- We were not aware that we only had permission to submit computer produced formats for Schedule A and B only. Therefore, also enclosed is a letter requesting permission to use the computer generated format for the Summary and Detailed Summary Pages as well.

If you have any questions or need additional information, please contact me at 216-689-4486.

Sincerely,

A handwritten signature in cursive script that reads "Peter E. Brereton".

Peter E. Brereton
Treasurer
KeyCorp Political Action Committee



November 3, 1998

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Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

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Dear Ms. Kitchen:

I request authorization to use the attached computer generated format of the Summary and Detailed Summary Pages for KeyCorp Political Action Committee, referenced above, for all future FEC filings. KeyPAC has prior authorization to use this computer format for Schedule A and Schedule B.

If you have any questions, I can be reached at 216-689-4486. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Peter E. Brereton". The signature is written in black ink on a white background.

Peter E. Brereton
Treasurer
KeyCorp Political Action Committee