

ETEXT ATTACHMENT

12/04/2006 23 : 57

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Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036

September Monthly Report (8/1/06-8/31/06)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated November 1, 2006, regarding the 2006 September Monthly Report filed by SEIU COPE. In that letter you raise questions about three expenditures disclosed by SEIU COPE on Schedule B of its September 2006 Monthly Report.

The expenditures for Billboard Design/Production and for Billboard placement were for billboards which referred to clearly identified Federal candidates and as such are properly characterized as public communications. However, these public communications did not expressly advocate the election or defeat of the identified candidates and were not independent expenditures or in-kind contributions. These expenditures should have been reported on Line 21(b) instead of Line 29 and an amended report has been filed to make these changes.

The expenditure for Phone Survey and Research was for an opinion survey of likely voters regarding their views regarding candidates and issues. The expenditure did not advocate the election or defeat of clearly identified Federal candidates nor was it an in-kind contribution to a Federal candidate. This expenditure should have been reported on Line 21(b) instead of Line 29 and an amended report has been filed to make this change.

I you have any further questions regarding this matter, please feel free to contact me at 202-730-7465.

Very truly yours,
John J. Sullivan
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE

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