

ETEXT ATTACHMENT

10/10/2002 13 : 29

October 10, 2002

Ms. Jane Parks
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Reference: September Monthly (8/1/02 - 8/31/02)

Dear Ms. Parks:

In response to your letter of October 4, 2002, requesting the amendment and clarification of ABA BankPac's reporting methods for payroll deductions, please find attached a copy of correspondence dated January 18, 2002 to Alice Kang, RAD Analyst, regarding the same issue.

Upon receipt of Alice Kang's letter earlier this year, we contacted GNOSSOS Software, the company we use to file electronically. After discussions with employees at GNOSSOS Software as well as an official at the Federal Election Commission, we have concluded that the law you referenced offers an option between 1) reporting the aggregate amount received within the reporting period and stating the amount deducted per pay period (as you have requested), and 2) separately itemizing each contribution (as we have done).

I welcome the opportunity to speak with you directly regarding this or any other issues. If you have any questions please feel free to contact me at (202) 663-5115.

Sincerely,

Stephen Crochet
Assistant Director, BankPac

attachment

January 18, 2002

Ms. Alice Kang
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Reference: October Monthly Report (9/1/2001 - 9/30/2001)

ETEXT ATTACHMENT

Dear Ms. Kang:

In response to your letter dated January 9, 2002, please find enclosed a copy of a letter to Clark Briner, Director of Finance for the Friends of Sam Johnson campaign committee, requesting a refund in the amount of \$1,409.45.

We apologize for this inadvertent error. It was a result of our affiliated committee, the Texas Bankers Association Federal PAC, making an in-kind contribution to the Friends of Sam Johnson campaign committee. We will report the refund in the proper manner (FEC Line 16) once the funds are received.

As to the election designations for the 2001 Special Elections in South Carolina and Massachusetts addressed in your letter, an amended report with the proper election designations has been electronically filed with the Federal Election Commission.

On the topic of the reporting methods for our payroll deductions, I am sending you, under separate cover, a letter addressing the language of 11 CFR § 104.8(b).

Upon receipt of the refund from the Friends of Sam Johnson campaign committee, in addition to the electronic amendment currently filed for our October Report, ABA BankPac and the TBA PAC will be in compliance with the laws of the Federal Election Commission.

If you have any questions you may contact me at (202) 663-5115.

Sincerely,

Stephen Crochet
Assistant Director, BankPac