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April 23, 2007

Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analyst Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: C00079541- 30 Day Post-General Report (10/19/06 - 11/27/06)

Dear Ms. Lewis:

The purpose of this letter is to respond to your letter dated March 23, 2007 regarding the 30 Day Post-General Report (10/19/06 - 11/27/06) of NARAL Pro-Choice America PAC, identification number C00079541.

You inquire about an outstanding balance to "LSG Strategies" that was not disclosed on the 2006 12 Day Pre-General Report. On March 23, 2007, the Committee filed an amendment to the 12 Day Pre-General Report which disclosed this outstanding balance.

You ask about the absence of a MEMO Schedule E on the 12-Day Pre-General Report disclosing an independent expenditure paid to "LSG Strategies." The amendment to the 12 Day Pre-General Report, filed March 23, 2007, included a MEMO Schedule E for this expenditure.

You note that Schedule E was not electronically signed by the treasurer. On March 23, the Committee filed an amendment to the 30 Day Post-General Report that included the treasurer's signature on Schedule E.

You ask about 24 hour notices with "LSG Strategies" as the payees that do not correlate with entries disclosed on Schedule E. The amendment to the 12 Day Post-General Report addresses this issue.

You inquire about expenditures for "Printing" and "Automated Calls" and whether these expenditures were for public communications or voter drive activity containing express advocacy. These expenses were for the Committee's own activities. They were not public communications or voter drive activity containing express advocacy as defined under 11 C.F.R. 100.22, and were therefore not independent expenditures or in-kind contributions.

You ask about the Committee's use of "best efforts" to obtain the name, mailing address, occupation and name of employer of its donors. The Committee's practice is to ask for the required information on all of the PAC solicitations via a clear and conspicuous request.

If the information is not provided with the initial contribution, the Committee's practice is to ask for the information in a separate written request, within two weeks of the contribution being received. The request clearly asks for the information, without soliciting the contribution; informs the contributor of the requirements of federal law for the reporting of such information; and includes a pre-addressed post card or return envelope. If the information is not received, the Committee's practice is to send a second mailing and to make a telephone call to the donors if their contributions exceed, in the aggregate, \$200 per calendar year. When the Committee receives information after the contribution has been reported, the Committee will file an amended Schedule A with its next regularly scheduled report listing all the contributions for which additional information was received.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Ezra W. Reese
Counsel to NARAL Pro-Choice America PAC
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