

Via Federal Express and Form 99 Electronic Filing

March 16, 2008

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Disaffiliation by Time Warner Political Action Committee, ID No. C00339291

Dear Commissioners:

By this letter, together with an amendment to its Statement of Organization via a separate electronic filing, Time Warner Political Action Committee, Committee ID No. C00339291, hereby notifies the Federal Election Commission of its disaffiliation from Time Warner Cable Federal Political Action Committee, Committee ID No. C00431551.

Time Warner Inc. (TW) has divested its ownership interest in Time Warner Cable (TWC), for which the record date for the dividend distribution of TWC common stock is March 12, 2009. Thus, as of that date, the separation of TWC became effective, with TWC no longer operating as a subsidiary of TW, and the TW PAC and TWC Federal PAC thus no longer having any legal affiliation. The underlying rationale for this conclusion is set forth in further detail below.

First, the TW PAC and TWC Federal PAC no longer satisfy the Commission s per se affiliation criteria for corporate separate segregated funds, given that the PACs are no longer established, financed, maintained, or controlled by the same corporation. 11 C.F.R. 100.5 (g)(2).

Second, the PACs and their connected organizations no longer exhibit the indicia of affiliation set forth in the Commission regulations. Neither organization nor committee has the authority or ability to direct or participate in the governance of the other organization or committee. 11 C.F.R. 100.5 (g)(4)(ii)(B). Neither organization nor committee may hire, appoint, demote, or otherwise control the personnel of the other organization or committee. 11 C.F.R. 100.5 (g)(4)(ii)(C). Neither organization nor committee has any common or overlapping officers or personnel with, provides funds or goods in significant amounts or on an ongoing basis to, or causes funds to be provided in such amounts or manner to the other organization or committee 11 C.F.R. 100.5 (g)(4)(ii)(E-H).

While TW did have a role in the formation of TWC (11 CFR 100.5(g)(4)(ii)(I), and while TW PAC and TWC PAC may have had similar patterns of contributions, contributors, or both (11 CFR 100.5(g)(4)(ii)(J)), these actions were vestiges of a common history as parent and subsidiary corporations, a relationship that has now been severed. In similar circumstances, the FEC has found two formerly affiliated PACs to be disaffiliated, notwithstanding such past, historical connections. See advisory opinion 2000-36.

The TW PAC will also cease to be affiliated with the Bright House Networks, LLC (BHN) PAC, Committee ID No. C00402875, because this affiliation was based on an ongoing connection between Time Warner Cable Inc., and Bright House Networks LLC. The managers for the TW PAC, the TWC Federal PAC and the BHN PAC recognize and accept the obligation to account for the others pre-separation contributions for the purpose of complying with the limitations due to their affiliated status up to and including March 12, 2009.

Please contact us if you have any questions or concerns regarding this matter.

ETEXT ATTACHMENT

Respectfully,
Steve Vest
Treasurer, Time Warner PAC

cc: Rachel Welch, Treasurer, Time Warner Cable Federal PAC, (ID No. C00431551)
Meredith Kelley, Treasurer, Bright House Networks, LLC PAC, (ID No. C00402875)