

June 1, 2008

Mr. Corbin T. Jones
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Jones:

Rock City PAC (FEC ID# C00436410) is in receipt of your Request for Additional Information dated May 2, 2008, concerning the PAC's 2008 April quarterly FEC report.

The payments for "Catering Costs," "Catering Expense," "Event Expense," "Fundraising consulting Fee" and "Fundraising List Development" on Schedule B were solely made for the benefit of Rock City PAC. These were all in connection with Rock City PAC meeting and fundraising activities. None of these expenditures were made on behalf of specifically identified federal candidates, and these disbursements are properly disclosed as operating expenditures on Line 21b. No Schedules B or E for Lines 23 or 24 are required with respect to these disbursements.

Similarly, the payment for "Printing Costs" was an expense solely for the benefit of the PAC. As such, it contained no express advocacy, and did not constitute an expenditure for public communications or voter drive activity. Therefore, it did not qualify as an in-kind or an independent expenditure, and is appropriately disclosed on Line 21b.

Sincerely,

Kimberly Kaegi, Treasurer
Rock City PAC
