

ETEXT ATTACHMENT

06/02/2003 11 : 42

May 29, 2003

Ms. Antionette L. Kitchen
Federal Election Commission
999 E St., NW
Washington, DC 20463

Dear Ms. Kitchen:

RE: TN Republican Party Federal Election Account Victory 96
FEC Identification Number C00040220

Amended October Quarterly Report (7/1/2002 - 9/30/2002)
Amended 12 Day Pre-Primary Report (10/1/2002 - 10/16/2002)
30 Day Post-General Report (10/17/2002- 11/25/2002)

As we have discussed over the phone, there are a number of issues you have questioned in the requests for additional information relating to the above referenced reports and amendments to reports which we have not been able to determine the reason the information appeared in the reports when they were electronically filed. Those responsible for converting the information input into the software we purchased for the purpose of disclosing the information to the Commission in the electronic format have reached an impasse. At my instruction, we contacted the Commission's electronic filing office and have begun working through them to convert our database into a format which will enable us to convert the information into "FECFile". Upon the completion of this conversion we will begin to file amended reports as far back as necessary in order to correct the areas you have questioned in the above referenced reports and other reports as may be necessary.

Among the issues we are intending to correct are the following:

∏The contributions made to various Congressional committees, all of which appeared as contributions to primary elections, when in fact we had presented them as both primary and general election contributions in a manner consistent with the information you sent us in your letter questioning our disclosure.

∏The question on more than one of the above referenced documents regarding additional receipts and disbursement appearing when they were not disclosed on the original report.

I am not sure how these and other similar types of issues arose from the information we input into the systems and the information we transmitted to the Commission.

As I said at the outset, we are working with those people in your electronic filing office and have begun to transfer data into a new database which will enable us to file electronically with FECFile.

With respect to questions I can address:

∏Those items disclosed as "Independent Advocacy" were just that. They were not made on the behalf of specifically identified federal candidates. Neither were those items shown as Campaign Expenses - Direct Mail or Campaign Expenses - Mail. These mailings were GOTV or similar types of mailings.

∏With respect to your comments about our "best efforts" in complying with requirements to obtain the full name, mailing address, occupation and name of employer for those individuals who contribute in excess of \$200 in a calendar year. (11C-FR 104.3(a)(4)(i)). We routinely mail second request for the required information. Those requests follow the Commission's guidelines for establishing "best efforts". If we receive a response from these second requests we update our database and prepare a list of the changes. That information is forwarded to the FEC.

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□The issue you questioned regarding the MEMO entry from Kaegi Resources was incorrectly coded. It should have been disclosed as "Consulting - Financial" for the 30 day Post-General report.

□The amount of the transfer from the National Republican Senatorial Committee was in the amount of \$90,000 rather than the \$89,296 we showed on our report.

□The contribution from Mr. Tom Cone in the amount of \$23,000 was intended as a non-federal and was coded incorrectly for the 30 Day Post-General report.

I will keep you posted as we continue to prepare our new database for use with FECFile. I am confident that with the assistance of your electronic filing office we can resolve the remainder of the outstanding issues.

Sincerely,

L. Stuart Dungan
Controller