

March 11, 2011

Edward D. Ryan
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Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00459123

Reference: 12 Day Pre-General Report (10/1/10-10/13/10)

Dear Mr. Ryan:

This letter is in response to your request for additional information, dated February 4, 2011.

Your letter indicates that the Committee has met the requirements for multicandidate status. However, the Committee has been operating under the widely accepted and understood premise that the requirement concerning the receipt of contributions from at least 51 persons means contributions from individuals, not other political committees. The Committee has received contributions from only 31 individuals at this time.

During further discussions with various FEC personnel, the Committee has been given conflicting information regarding the policy of the reports analysis division. One analyst has previously stated specifically that the requirement is only met if the contributions are from individuals. Another analyst indicated that the Commission has always assumed that other political committees are included in the 51 person contribution requirement. A third FEC staff member told Committee representatives that an internal policy memo was issued to the reports analysis staff in 2002 or 2003 clarifying that the 51 person requirement does include other political committees, but this policy change was never disseminated to the reporting community.

Based on the historical policies of the Commission, the New Pioneers PAC did not fail to file the Form 1M. However, assuming that the current policy does include political committees in the 51 person requirement, the Committee is willing to file the Form 1M stating that it has reached multicandidate status as of the date of the notification it received from the Federal Election Commission, which was February 4, 2011. All transactions for New Pioneers PAC prior to this date would still fall under the nonqualified limits.
