

**ETEXT ATTACHMENT**

10/10/2008 20 : 21

[BeginText]

October 10, 2008

via electronic filing

Ms. Rosa G. Lewis  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: SEIU COPE April Monthly Report (3/01/08-3/31/08)

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated September 10, 2008.

We are filing an amended report which will provide further clarifying information regarding the items referred to in your letter.

Your letter also raised questions with respect to expenditures for "press release" and "fundraising calls". During the reporting period, expenditures were made for phonebank services in connection with fundraising to members of the union's solicitable class. These calls to the union's members did not constitute "public communications" under the FECA or the Commission's regulations and were therefore properly reported on line 21 as an Operating Expense. Similarly, SEIU COPE paid for the distribution of a press release which did not constitute a "public communication" under the Commission's regulations and was properly reported on line 21 as an Operating Expense.

Please feel free to contact me if you have any further questions

Sincerely,

John J. Sullivan  
Associate General Counsel  
Counsel for Government Affairs  
[EndText]