

September 8, 2009

Ms. Alexandra T. Broomhead
Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Broomhead:

The Oregon Republican Party is in receipt of your Request for Additional Information dated August 26, 2009, concerning our amended May 2009 monthly FEC report.

With respect to the Party's expenditures for payroll, payroll taxes, and other payroll or employee benefit-related expenses, the Party adheres to the regulation and the Advisory Opinion cited in your letter, and also follows the Commission's revision of the rules as adopted on December 1, 2005. Specifically, as you outlined in your letter, the Party pays for these costs with 100% federal funds when the employee spends more than 25 percent of his or her time in a month on federal election activity (FEA) or activity in connection with a federal election. These expenditures are reported on Schedule B for Line 30b.

Alternatively, when an employee does not meet the 25 percent threshold, the Party allocates these costs as an overhead/administrative expense, and reports these disbursements on a Schedule H4 for Line 21a.

The Party also followed these procedures with respect to payroll, payroll taxes and other payroll or employee benefit-related expenses paid during May, June, July, and August of 2009, and will continue to follow these procedures for future payment of these types of expenditures.

Sincerely:

Dennis Morgan, Treasurer
