

FEDERAL ELECTION COMMISSION

WASHINGTON, DIC 20463.

Margaret C. Coughlin, Treasurer Rhode Island Republican State Central Committee 551 South Main Street Providence, RI 02903

DEC 8 1999

Identification Number:

C00078196

Reference:

Mid-Year Report (01/01/99-6/30/99)

Dear Ms. Coughlin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule D of your 1999 Mid-Year Report discloses in-kind debt payments that appear to be reported incorrectly. Please be advised that in-kind contributions used to pay for allocable expenditures, should be disclosed as a receipt(s) on Schedule A and a disbursement(s) on Schedule H4 in order to avoid inflating the cash on hand amounts. The H4 schedule should disclose the total amount of the disbursement, the federal share that was paid by the in-kind contribution and the non-federal share of the disbursement.

In addition, Schedule D should disclose the outstanding beginning balance this period and the entire payment made this period including both the federal and nonfederal share.

A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). These transfers must be disclosed on Schedule H3.

Please clarify the procedure you are currently using to allocate shared activity. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Christine E. Burkhart

Reports Analyst

Reports Analysis Division

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