Republican
National
Committee

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Counsel

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October 25, 2000

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Dear Mr. Ciaraldi,

This is in response to your letter of October 11, 2000 referencing the April Monthly Report of the Republican National Committee.

Advisory Opinion 1992-33 provided two alternatives for national party committees to report in-kind contributions. The Republican National Committee has elected to follow the alternative provided by the Federal Election Commission ("the Commission"). In-kind contributions are reported on Schedule H3, Schedule H4, and on Line 1 of Schedule I with a reference to Schedule H4 for each in-kind contribution. This has been the practice of the Republican National Committee since October 14, 1992.

If you believe the Republican National Committee has misinterpreted the Commission's Advisory Opinion 1992-33, I suggest we meet after November 7, 2000 to discuss your interpretation.

Sincerely,

Tom Josefiak

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Federal Election Commission

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