

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - Ł

March 8, 2013

Mr. James McAllister
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re:United Association Political Education Committee
30 Day Post-General Report (10-18-2012-11-26-2012)
Your Identification No. C00012476

Dear Mr. McAllister:

This response is made in connection with the above-referenced matter and will be filed electronically and also sent by U.S. mail. This law firm represents the United Association Political Education Committee (United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada) ("UAPEC") and its Treasurer, William P. Hite and provides this response on their behalf. The UAPEC is in receipt of your letter dated February 5, 2013 in which you raise two items in connection with the above-referenced report.

No. 1. Clarify the reference to "Election Materials for Members" by amending Schedule B supporting Line 21(b). An amended report will be filed within the next ten days identifying the expense as "printing."

No. 2. Schedule E of the report indicates that the Committee may have failed to timely file one or more of the required 24 hour "last minute" independent expenditure reports. A 24/48 Notice of Independent Expenditure Schedule E was filed on November 7, 2012, in connection with the design, production and printing of posters and bumper stickers with the words "Union Plumbers & Fitters Obama Biden. While these items were distributed only to the connected organization's affiliates and restricted class, given their nature, and in an abundance of caution, UAPEC determined that a Schedule E would be filed. The reason why this report was filed after the election was because the vendor failed to send an estimated cost or invoice until after the election, and notwithstanding the best efforts of the Committee, the UAPEC's service provider responsible for filing the report was unable to connect the organization's receipt of the posters and bumper stickers from the vendor with the cost until after the election. While the UAPEC timely filed several 24/48 Notice of Independent Expenditure Schedule E reports during the 2012 election cycle, the UAPEC understands that the expenditures in question, to the extent they are independent expenditures, would not have been filed on a timely basis, and it continues to strive to improve upon its reporting obligations. The date of the expenditure on the filed Schedule E matches the date the invoice was received. UAPEC believes a more appropriate date should have been used. The material in question was distributed to affiliates over the course of approximately a month from early September into October 2012. An amended report will be filed within the next ten days identifying the date of the expense as September 3, 2012.

A-G79 @ B9CI G'H9LH'fl 97 : cfa ' - - Ł

Please contact me if you have any questions or need any clarification about the above explanation.

Sincerely,

/s/ Francis J. Martorana

O'Donoghue & O'Donoghue LLP
4748 Wisconsin Ave., NW
Washington, DC 20016
