

In response to a letter dated 7/13/07 from the FEC, we filed an amendment to our 2005 July Mid Year report (FEC-182851) to reflect that the check for \$1000 dated 2/15/05 to Chet Edwards for Congress should have been attributed to 2004 General Election Debt Retirement. The payroll contributions in this amendment are aggregated compared to the original filing due to the fact that we had switched to a new software provider in 2005.

The following is a summary of responses provided to Sylvette Seay, Campaign Finance Analyst, in our letter dated August 10, 2007.

I am writing in response to your letter of July 13, 2007, which requested information regarding several items in the 2005 Mid-Year Report of the Verizon Communications Ince Good Government Club ("Verizon PAC"). Item 1 in your letter identifies contributions to two candidates (Bass Victory Committee and Cantor for Congress) which, in your opinion, appeared to exceed applicable contribution limits. However, it appears that you have counted towards the applicable limits contributions made by the MCI LLC Employees Political Action Committee ("MCI PAC") prior to the date it became affiliated with the Verizon PAC. The Verizon PAC (C00186288) and MCI PAC (C00142836) became affiliated in January 2006. Contributions made by affiliated PACs prior to the date of their affiliation are not subject to a shared aggregate limit. See Advisory Opinion 1985-27. Therefore, as you and I discussed in our telephone conversation of August 9, 2007, the contributions to the two candidates cited in your letter are in fact permissible. Accordingly, these contributions were noted in your letter in error, and no further action is necessary. Item 2 in the July 13, 2007, letter identifies contributions to a political committee (Rely on Your Beliefs Fund) which, in your opinion, appeared to exceed applicable contribution limits. For the same reasons, as with the contributions discussed in Item 1, no further action is necessary. Item 3 in the July 13, 2007, letter similarly identifies contributions to a National Party Committee (the National Republican Senatorial Committee) which appeared to exceed applicable contribution limits. Again, the two contributions in question were made by the MCI PAC and Verizon PAC prior to their date of affiliation. As with the contributions discussed in Item 1, no further action is necessary. Item 4 in the July 13, 2007, letter identifies an apparently excessive contribution to a Federal candidate (Stevens for Senate Committee). As your letter points out, the Verizon PAC has already taken corrective action with respect to the excessive contribution. Item 5 of the letter identifies apparently excessive contributions to Federal candidates (Friends of George Allen and Bill Nelson for US Senate). A number of the contributions listed in your letter were made by the MCI PAC prior to its affiliation with the Verizon PAC. However, even when the MCI PAC contributions are excluded, and refunded amounts are taken into account, it appears that the Verizon PAC's contributions to each candidate still exceed the applicable limits. The Verizon PAC is requesting refunds from Friends of George Allen and Bill Nelson for US Senate. Item 6 in the July 13, 2007, letter cited two contributions (to Chet Edwards for Congress and the DeMint for Senate Committee Inc.) that were apparently made after the relevant election dates. The February 15, 2005, contribution to Chet Edwards for Congress is part of the amendment. The February 15, 2005, contribution to the DeMint for Senate Committee, Inc. was never cashed and is believed to have been voided. The Verizon PAC's Year-End Report due in January 2008 will reflect the cancellation of this check, and the PAC will send the DeMint for Senate Committee, Inc. a letter notifying them of the cancellation. Copies of all corrective letters will be included in a package which will be delivered to the FEC on August 13, 2007.

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