

ETEXT ATTACHMENT

11/14/2005 23 : 02

Page 1 of 2

November 14, 2005

BY ELECTRONIC DELIVERY

Edward D. Ryan

Campaign Finance Analyst

Reports Analysis Division

Federal Election Commission

999 E Street, N.W.

Washington, D.C. 20463

Re: Letter dated October 14, 2005, regarding Amended 30 Day Post-General Report (10/14/04-11/22/04), received on July 25, 2005

Dear Mr. Ryan:

On behalf my client, the Republican Party of Louisiana ("the Party"), I am writing in response to the Commission's letter dated October 14, 2005, regarding the Party's Amended 30 Day Post-General Report (10/14/04-11/22/04), which was received by the Commission on July 25, 2005.

First, the Commission asked the Party to clarify an additional \$30,000 disbursement to Giles & Associates that was not listed on reports preceding the July 25, 2005, amendment. The Party disclosed six disbursements to the company on its original Post-General Report and its first Amended Post-General Report. On June 15, 2005, the Commission requested clarifying information about the nature of these disbursements. While preparing the response to the Commission's letter, the Party discovered the additional \$30,000 disbursement to Giles & Associates had not been listed, and reported the payment on the July 25, 2005, amendment.

Second, the Commission requested that the Party disclose additional information regarding disbursements to GCR & Associates, Inc. totaling \$18,000, and AT&T Wireless totaling \$16,311.14, which were listed on Schedule E of the Post-General Report. Both disbursements paid for telephone calls to Louisiana residents. Thus, the calls were "public communications" that qualified as "telephone banking." See 2 U.S.C. 431(22), (24); 11 C.F.R. 100.26, 100.28. A disbursement for a public communication that assists voters in "engaging in the act of voting" is a "get-out-the-vote activity" that is reportable as federal election activity. See 2 U.S.C. 431(20)(A)(ii); 11 C.F.R. 100.24(a)(3). The payment must be listed on Schedule B supporting Line 30(b). See 2 U.S.C. 431(20); 11 C.F.R. 100.24; F.E.C. Instructions for Form 3X (Dec. 2004). Alternatively, a payment for a public communication containing express advocacy - a message that advocates the election or defeat of a clearly identified candidate - must be disclosed as an independent expenditure on Schedule E supporting Line 24. See 2 U.S.C. 431(17)(A); 11 C.F.R. 100.22(a); F.E.C. Instructions for Form 3X (Dec. 2004).

Since it submitted the Amended Post General Report, and while preparing for this response, the Party learned that a portion of the disbursement to GCR & Associates paid for automated telephone messages to Louisiana residents urging them to vote for three federal candidates, rather than the nine candidates the Party had previously disclosed. The payments supporting the three candidates totaled \$2,414.70, or \$804.90 per candidate, and have been itemized as independent expenditures on Schedule E supporting Line 24. See 2 U.S.C. 431(17)(A); 11 C.F.R. 100.22(a); F.E.C. Instructions for Form 3X (Dec. 2004). Because none of the expenditures exceeded the \$1,000 aggregate threshold, no 24-hour reports were required. See 2 U.S.C. 434(g)(1)(A); 11 C.F.R. 104.4(c).