

Federal Election Commission  
C/O Erinn D. Larkin  
999 E Street, NW  
Washington, DC 20463

Identification Number: C00011114

This responds to your April 16, 2008 letter regarding the Committee's report for the period November 1 through November 30, 2007.

1. On Schedule E, Line 24 of this report, the Committee disclosed disbursements for Independent Expenditures in support of Hillary Clinton for U.S. President. Each of these communications is an Independent Expenditure as that term is defined at 2 U.S.C. 431(17). None of these communications constitutes a Coordinated Communication as defined at 11 C.F.R. 109.21. For this reason the communication costs are not in-kind contributions, and were properly disclosed as Independent Expenditures.

2. On Schedule E, Line 24 of this report, the Committee reported disbursements for unitemized Independent Expenditures. These unitemized disbursements were, in fact, made to a single payee, and do aggregate in excess of \$200. As per the instructions you provided to the Committee during our telephone conversation of May 15, 2008, we are providing the following explanation for the Committee's failure to itemize these disbursements:

The Committee attempted to itemize each of these disbursements as required by 11 C.F.R. 104.3(b)(3)(vii); however, these Independent Expenditures were made with respect to elections in a number of states. As you are aware, the FEC File software does not permit the aggregation of disbursements for Independent Expenditures made with respect to an election in one state with disbursements for Independent Expenditures made with respect to an election in another state. Because the FEC File software does not allow the aggregation of these disbursements, it likewise does not allow for itemized reporting of these disbursements.

Please let us know if you require any additional information.

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