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March 3, 2004

Erik W. Koeppen
Report Analyst
Reports Analysis Division
Federal Elections Commission
Washington, D. C. 20463

Identification Number: C00197228

Reference: Your letter dated February 25, 2004 re Year End Report
(12/1/03 - 12/31/03)

Dear Mr. Koeppen:

Thank you for your letter to Cal Lockett, Treasurer of WellPoint Health Networks WELLPAC, regarding WELLPAC contributions that appear to exceed the limits set forth in the Act, 2 U.S.C. 441a(a), which prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

It appears that the analysis of WELLPAC's Year End Report is based on a belief that WellPoint is still an affiliated organization that must share a single limit on the contributions it makes to candidates and to other political committees. However, please be advised that WellPoint is no longer affiliated with the Blue Cross Blue Shield Association or any other Blue Cross and/or Blue Shield health plan, effective February 18, 2000. The FEC Advisory Opinion documenting this separation is AO-1999-39, issued on February 18, 2000.

All 2003 WELLPAC contributions made to the candidate PACs referenced in your letter are within the \$5,000 per election limitation:

Earl Pomeroy for Congress \$3,000
Bush-Cheney 04 Inc. \$5,000
Mike Dewine For US Senate \$4,000

I hope I have responded satisfactorily to your inquiry, but please don't hesitate to contact me if you have any further questions.

Sincerely,

Susan K. Nagy
Assistant Treasurer, WELLPAC
WellPoint Health Networks
1 WellPoint Way, T2-1A6
Thousand Oaks, CA 91362
(805) 557-6788