

September 8, 2006

Ms. Jodi Winship  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: All America PAC  
FEC ID No. C00344788

Dear Ms. Winship:

This is in response to your letter dated August 11, 2006 concerning the July Quarterly Report (4/1/06-6/30/06) of All America PAC (the "Committee").

You note that the totals listed on Lines 6(c), 7, 11(a)(iii), 11(d), 19,20,21(b), 21(c), 31 and 32 Column B of the Summary and Detailed Summary Pages appear to be incorrect. The Committee will separately file an amendment to this report to correct this discrepancy.

You ask about expenditures for "List Rental," "Telephone & Fundraising Expenses," "Catering," and "Fundraising Consulting Services" made by the Committee. These expenditures were for the Committee's own activities and were not made on behalf of any specifically identified federal candidate.

You also ask about expenditures for "Business Reply Mail Account," "Communications Consulting/Office Expenses," "Communications Consulting Services," "Postage," "Printing," and "Production Services". The expenditures you cite were made to conduct the Committee's own general activities and programs and did not contain express advocacy or mention federal candidates.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Robert F. Bauer  
Counsel to All America PAC

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