

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - t

Via Electronic Filing

Ben Holly
Senior Campaign Finance Analyst
The Federal Election Commission
999 E Street, NW
Washington, DC 20463

In RE: NARAL Pro-Choice America PAC (C90004185)
Year End Report (10/1/12 to 13/31/12)

Dear Mr. Holly:

This is in response to your letter of June 10, 2013 concerning the above referenced report for NARAL Pro-Choice America independent expenditures. You ask about four areas of disbursements, each will be addressed below.

First is the issue of late filed 24-hour Notices. The expenses itemized in your letter were reported on an amended Form 5 covering the period 10/25/12 to 10/25/12.

The second concern was that of a Late Filed 48-hour Notice, specifically the media production costs related to a media time buy. These expenses were filed on an amended 48-hour Notice received by the Commission on 10/23/12.

The third issue regards two items which were filed on 24-hour Notices but not found on the Quarterly Report. Both items are found on the Year End report. The expenditure amounts differ due to the nature of the 24- or 48-hour reports as estimates; Schedule 5-E reflects the final and accurate expenditure amounts.

Finally, you ask about independent expenditures that appear on the Year End Report that did not appear on 24-hour reports (?Missing 24-Hour Notices?). Here again, the expenditure amounts differ due to the process of first reporting estimated amounts and later, on the Quarterly report, showing final and accurate expenditure amounts.

It is hoped that the above is responsive to your concerns. Please be in touch should you have additional concerns or questions.

Sincerely,

Ezra Reese
Counsel for
NARAL Pro-Choice America