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November 6, 2009

Ms. Andrea Needles  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Dear Ms. Needles:

This letter is being submitted to respond to the RFAI dated October 23, 2009 regarding \$29,500.00 in additional non-federal disbursements reported on the Amended September Monthly Report. Your letter correctly requests a reason why our Amended September Monthly Report disclosed additional disbursements not included on our original report.

Please note that we at SmithKline Beecham Corp. PAC (GlaxoSmithKline PAC) strive to meet all federal reporting obligations and at the time the original report was filed believed that all data was included. A review of our records following the September Monthly reporting deadline revealed that several non-federal contributions were inadvertently omitted from the original report. Immediately, of our own accord, we filed an amended report to disclose the additional non-federal transactions - prior to filing our next scheduled report due on October 20, 2009. In no way did our failure to include these non-federal disbursements on the original report come from an attempt to keep activity out of the public record. You will note that none of the additional non-federal disbursements were tied to any election in 2009. The public record will reflect all 2009 PAC transactions before any 2010 elections.

We regret this clerical oversight and our vendor will be assisting us in more contemporaneous recordkeeping to avoid a similar situation in the future. Rest assured that procedures are in place to avoid such an accidental omission in the future.

We trust this answers the Committee's concerns, but if there are any other questions please do not hesitate to contact me.

Sincerely,

David Miller  
Treasurer

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