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FEC MAIL
OPERATIONS CENTER

Humana Political Action Committee
1776 Eye Street, NW
Suite 890
Washington, DC 20006
(202) 467-5821 Tel

2003 DEC 19 P 2:43



December 18, 2003

Kristen Davis
Campaign Finance Analyst
Reports Analysis Division
Federal Elections Commission
Washington, DC 20463

Identification Number C00271007

RE: Amended March Monthly Report (2/1/03-2/28/03), received 8/18/03,
Amended April Monthly Report (3/1/03-3/31/03), received 8/18/03,
Amended May Monthly Report (5/1/03-5/31/03), received 8/18/03,
Amended June Monthly Report (6/1/03-6/30/03), received 8/18/03,
Amended July Monthly Report (7/1/03-7/31/03), received 8/18/03,
September Monthly Report (8/1/03-8/31/03), and
October Monthly Report (9/1/03-9/30/03)

Dear Ms. Davis:

This letter is in response to your letters dated November 26 and December 10, 2003, regarding the above-mentioned reports. These reports did not fully disclose the occupation and employer of Humana PAC's donors.

Upon investigating the matter, we determined that there was an error in the way we were loading the information into our PAC database management system. We have corrected the problem and verified that the occupation and employer fields will appear on the reports from now on.

We will be filing amended reports of the past reports today.

Thank you for your attention in this matter.

Regards,


Mary McKenzie Rosado
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 10, 2003

Mary McKenzie, Treasurer
Humana Inc. Political Action Committee
1776 Eye Street NW, Suite 890
Washington, DC 20006

Response Due Date:
January 9, 2004

Identification Number: C00271007

Reference: September Monthly Report (8/01/03-8/31/03) and October Monthly Report (9/01/03-9/30/03)

Dear Ms. McKenzie:

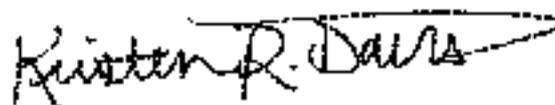
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-The identification of each contribution, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$ in the aggregate during the calendar year. Please amend Schedule reporting Line 11(a)(i) for each entry that appears to disclose the division in which the individual works instead of the employer.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,

A handwritten signature in black ink that reads "Kristen R. Davis". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Kristen Davis
Campaign Finance Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

RQ-2

November 26, 2003

Mary McKenzie, Treasurer
Humana Inc. Political Action Committee
1776 Eye Street NW, Suite 890
Washington, DC 20006

**Response Due Date:
December 26, 2003**

Identification Number: C00271007

Reference: Amended March Monthly Report (2/01/03-2/28/03), received 8/18/03,
Amended April Monthly Report (3/01/03-3/31/03), received 8/18/03,
Amended May Monthly Report (4/01/03-4/30/03), received 8/18/03,
Amended June Monthly Report (5/01/03-5/31/03), received 8/18/03, and
Amended July Monthly Report (6/01/03-6/30/03), received 8/18/03

Dear Ms. McKenzie:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

HUMANA INC. POLITICAL ACTION COMMITTEE
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First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

The identification of each contribution, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry that appears to disclose the division in which the individual works instead of the employer.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to

HUMANA INC. POLITICAL ACTION COMMITTEE
PAGE 3

provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Kristen Davis
Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>12-19-03</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>clm 13</i> PREPARER	<i>12-22-03</i> DATE PREPARED