

August 8, 2008

Andy Dodson  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: UAW V-CAP Year End Report (7/1/07 - 12/31/07)  
and April Quarterly Report (1/1/08 - 3/31/08)  
Identification Number C00002840

Dear Mr. Dodson:

On June 26, 2008, UAW V-CAP filed an amended Year End Report (7/1/07 -12/31/07) and an amended April Quarterly Report (1/1/08 - 3/31/08) to clarify our original disbursement descriptions in response to corresponding FEC clarification letters dated June 4, 2008. Originally, UAW V-CAP reported a number of disbursements as "Reimb-MBR Working at R1A" "Reimb Wages to UAW Local 600, UAW Local 644, and UAW Local 723." The FEC sought clarification of these disbursements in the June 4, 2008 letters as the descriptions lacked sufficient detail. Our amendments altered these descriptions to read "Payment for Leased Restricted Class Employees." Recently, you have expressed concern that this description also lacks sufficient detail. The purpose of this submission is to more fully describe these transactions and to assure the disbursements were proper.

The disbursements for "Payment for Leased Restricted Class Employees" at issue in our Year End and April 2008 Quarterly reports were payments for temporary employees who work on the administration of UAW V-CAP, including collecting and inputting data to track contributions in order to comply with Federal contribution reporting requirements and State of Michigan reporting regulations. These temporary employees also spend a substantial portion of their time engaged in membership communication to our restricted class, which may be paid directly by the UAW treasury or alternatively with hard money. These employees are UAW members, within our restricted class, who are on temporary leave to their Local Union, from their employer, and then leased to UAW V-CAP for proper purposes, much like Kelly Services might lease employees on a temporary basis. This procedure of UAW Local Unions leasing employees is similar to the process the International Union, UAW engages in when utilizing temporary organizers.

Our Year End and Quarterly reports, respectively, attempted to describe these transactions. We hope that this additional communication clarifies that the disbursements were made properly. If you have additional questions or concerns, please do not hesitate to contact us.

Sincerely,

Carlos F. Bermudez  
Attorney for UAW V-CAP

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