November 17, 2011
Chris Jones
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463
Identification Number:C90011875
Re: FEC Form 5, received 1/31/2011
Dear C. Jones:
This letter is in response to the inquiry sent on October 24, 2011, requesting additional information on the following items:
1.Your quarterly report discloses independent expenditures that do not appear on 24- hour reports. Please clarify the circumstances regarding the untimely disclosure of the independent expenditures in question.

Based on a review of our records it appears that although staff time expenses were incurred on 10/31/2010, the records were not complete as of the date of filing the 24 -hour report. While this occurrence is unusual, it is occasionally difficult to collect all time records on staff in order to prepare the 24 -hour reports. Because it is our understanding from RAD that 24hour reports may not be amended, the final totals, not the original estimates, were reported on the next regularly scheduled report filed, the Year End. The expenditures in question represent a small percentage of Sierra Club's overall spending on behalf of each candidate.
2.In addition, there appear to be inconsistencies in the amounts reported on 24- hour notices and Year End reports for certain independent expenditures. Please clarify the amounts in question in amendments to these reports or provide an explanation for the difference in amounts.

The expenditure amounts in question were all accurate at the time of filing. The New Media Firm refunded a portion of their fee after the 24 hour reports had been filed. The amounts reported on the Year End represent the final expenditure amounts.

Sincerely,
Gayle Sheehan
Sierra Club

Sierra Club

