

March 12, 2007

Kristin DeCarmine
Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Identification Number: C00403022, The Commonwealth PAC

Reference: 12 Day Pre-General Report (10/01/06 - 10/18/06)

Dear Ms. DeCarmine:

This letter is written in response to the Federal Election Commission ("Commission") Request for Additional Information ("RAI") regarding the Commonwealth PAC's ("PAC") 12 Day Pre-General Report.

Although all PAC solicitations have contained the required "clear and conspicuous" request for contributor information as required by 11 CFR 104.7(b)(1), at the time the 12 Day Pre-General Report was filed the PAC had not received all of the required identification information for all individuals who contributed over \$200 to the PAC. Since the report was filed, the PAC has followed-up with these individuals who failed to provide the required information. The PAC is filing an amended report today that includes this additional information.

The Commission pointed out that Schedule B, Line 21(b) of the PAC's report discloses negative memo entries. These memo entries are itemizations of larger credit card payments to airline companies where multiple tickets were purchased under one payment. For example, if four \$250 tickets were charged to the credit card to equal a total payment of \$1,000 but one ticket was returned, the airline would refund the ticket directly to the credit card company. The overall bill for this purchase would then appear as if it was \$750 instead of \$1,000. This would be reflected on the following month's credit card statement. The payment of \$750 would have appeared on a previous report as pro-rated expenditures for specific airline tickets.

The vendor did not write a refund or rebate check which was deposited into the PAC bank account thus requiring a line 15 entry. Instead, the refund would be reflected on the credit card bill. For internal accounting purposes, the negative memo entries have been entered on line 21(b) as a way to internally link specific credit card items to larger credit card payments that occurred previously. These entries do not change the cash on hand balances, but instead facilitate the management of credit card statements and payments.

All of the disbursements reported on Schedule B Line 21(b) for "Event Expense," "Pro-Rated Event Expense," "Pro-Rated Event Expenses," and "Pro-Rated Fundraising Expenses" were made for Commonwealth PAC related events and meetings. None of these disbursements were made on behalf or for the benefit of any specifically identified federal candidate or candidates.

All of the disbursements reported on Schedule B Line 21(b) for "Pro-Rated Direct Mail" and "Pro-Rated Printing" were for Commonwealth PAC related activities. None of these activities were made on behalf of a specifically identified federal candidate or candidates. Furthermore, none of the expenditures were made for public communications (as defined by 11 CFR 100.26) or for voter drive activity (under 11 CFR 106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR 100.22. Neither did any of the aforementioned expenditures consist of public communications or voter drive

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activity that referred to a clearly identified federal candidate or candidates, but did not expressly advocate the election or defeat of the federal candidate or candidates.

If the Commission requires any further clarification or filings on these matters, please let me know.

Sincerely,

Jessica Peterson
Commonwealth PAC Treasurer
