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Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

April 9, 2012

Ashley Carter  
Senior Campaign Finance Analyst  
Reports Analysis Division

Re: 48 Hour Report, received 1/10/12

This letter responds to your request for additional information dated March 5, 2012. Your letter requests the addition of a state designation for the disbursement disclosed on a 48-hour independent expenditure report filed by Priorities USA Action on January 10, 2012. This expenditure was for an Internet ad that was available in every state. We understand the FEC to take the position that a nationwide internet advertisement aired during a contested primary should be designated to all remaining primaries. Therefore, no report would have been due under AO 2011-28 (Western Representation PAC) because the relevant reporting thresholds were not crossed in any state.

Respectfully submitted,  
Greg Speed  
Treasurer  
Priorities USA Action

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