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November 19, 1998

**BY HAND DELIVERY**

Donald L. Averrett  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: 1998 April, July and October Quarterly Reports

Dear Mr. Averrett:

This will respond to the Request for Additional Information sent to me as treasurer of the Robins, Kaplan, Miller & Ciresi PAC (ID C00275909), which we received on November 6, 1998.

Alleged Excessive Contribution: Your letter questions the reporting method used by our PAC for reporting contributions to the PAC from members of the firm. We adopted and have used our reporting method following consultations with the Commission's staff in 1996. We have followed that advice consistently. Nonetheless, we will report as you now suggest and will amend the reports addressed in your letter. In accordance with the Commission's request, we understand that for all future filings we should show only a breakdown of contributions from the individual partners, and that we should not make a memo entry identifying the total amount of the contributions as coming from the firm.

As for the manner in which the partners of the firm contribute to the PAC, the monies contributed to the firm PAC are attributable to the partners' capital accounts; they are not from the general firm partnership accounts. Although for convenience, the checks deposited into the separate PAC checking account are firm checks, the monies are those of the partners, and are reported on each participating partner's K-1 IRS form.

Donald L. Averrett  
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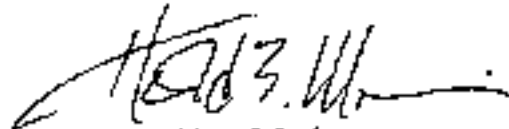
Approval for Schedule A: Under separate cover, we are seeking approval from the Commission for our computer produced formats for Schedule A. We would note we have been using this basic format for the past three years.

Administrative Expenses: Consistent with previous discussions with the Commission's staff, the treatment of administrative expenses in the reports cited in your letter has been done in the same manner since we began submitting reports in 1992. However, pursuant to the Commission's current request, we shall commence breaking out the PAC's administrative expenses and shall file amended reports for the three quarterly reports referenced in your letter. As a practical matter, the firm sponsors the PAC and will pay the PAC's administrative expenses as an in-kind contribution within the \$5,000 annual limit subject to the prohibitions and disclosure requirements of the Federal Election Campaign Act.

Thank you for your attention to this matter.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P. PAC



Harold E. Mesirov  
Treasurer

HEM/ks

4545109

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.

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