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THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE
120 Park Avenue
New York, NY 10017

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March 10, 1999

Democracy is not a Spectator Sport

Via Certified Mail

Kenneth Davis
Federal Elections Commission
Public Records Office
999 E Street, NW
Washington, DC 20463

Dear Sir/Madam:


Philip Morris Companies Inc. Political Action Committee
FEC Identification No. C00089136

This letter is in response to your request for additional information regarding our FEC Report covering the activities of the Philip Morris Companies Inc. Political Action Committee (PHIL-PAC) for the period October 1, 1998 through October 14, 1998.

You requested additional information regarding our receipt of funds from PM Wisconsin PAC. PM Wisconsin PAC was a state PAC registered in Wisconsin, managed by Philip Morris and thus considered a state affiliated PAC with PHIL-PAC. In accordance with Wisconsin law, PHIL-PAC periodically would transfer funds to PM Wisconsin PAC. Since 1995 PHIL-PAC has transferred \$16,050 to PM Wisconsin PAC. In 1998, PM Wisconsin PAC was dissolved, the balance of funds were sent from PM Wisconsin PAC to PHIL-PAC, since PHIL-PAC was the entity the funds originated from.

If you have any questions regarding this explanation, please contact me at (202) 637-1552.

Sincerely,


John F. Ostronic
Assistant Treasurer and
Secretary of the Board,
PHIL-PAC

Enclosure

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

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