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VIA FEDERAL EXPRESS

February 13, 2002

Mr. Erik W. Koeppen
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Northwestern Mutual Life Federal Political Action Committee ("NML FEDPAC")
Identification Number: C00197095
References: Mid- Year Report (1/1/01 -- 6/30/01); Year- End Report (7/1/01 -- 12/31/01)

Dear Mr. Koeppen:

This letter is to advise you that the amended Reports for the above-referenced were submitted electronically to the FEC on February 12, 2002.

With respect to Schedule B supporting Line 23, please be advised that this has been reclassified.

The amended Reports now disclose the name of employer for each individual contributing in excess of \$200 in the calendar year.

With respect to your comment regarding Schedule A supporting Line 11(a)(i), requesting that the amended report disclose the "frequency of the deduction" and citing 11 CFR § 104.8(b), please refer to the attached letter dated February 6, 2002 to you from Tammy M. Reou. It is our understanding that you concur with this interpretation. However, I understand that you requested that we remove the "payroll deduction" notation on our itemizations so as to avoid confusion. Unfortunately, due to computer system constraints, we are unable to remove that notation. We will continue to pursue this issue with our software vendor.

Should you have further questions, or need additional information, please do not hesitate to contact me at 414-665-2508.

Very truly yours,

Sara A. Holm
Assistant Treasurer
NML FEDPAC

cc: James Balagna



Northwestern Mutual

Tammy M. Rous
Assistant General Counsel

720 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4797
414 855 2647
414 855 1532 fax

February 6, 2002

VIA FACSIMILE

Mr. Erik W. Koeppen, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Northwestern Mutual Life Federal Political Action Committee ("NML
FEDPAC")
Identification Number: C00197095
References: Mid- Year Report (1/1/01 - 6/30/01)

Dear Mr. Koeppen:

This is in follow-up to an issue you raised in your letter to me of January 16, 2002, regarding reporting receipts from payroll deduction. Specifically, you requested that we amend Schedule A of our report to disclose the frequency and amount deducted per pay period, citing 11 CFR § 104.8(b). I have reviewed the cited regulation. It states in relevant part the following:

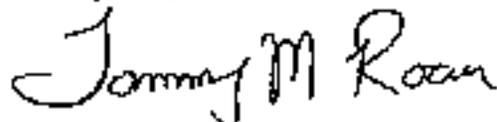
"In the case of a political committee . . . which receives contributions through a payroll deduction plan, such committee is not required to separately itemize . . . contribution(s). *In lieu of separate itemization*, such committee *may* report: the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual; and a statement of the amount deducted per pay period."

Based on the language of the regulation, it is clear that committees have the option of either (1) separately itemizing payroll deduction contributions, or (2) reporting them in the aggregate with a statement of the frequency and amount deducted per pay period. Since NML FEDPAC separately itemizes each payroll deduction contribution, we believe that our report, as filed, complies with 11 CFR § 104.8(b).

Mr. Erik W. Koeppen
Re: "NML FEDPAC" Mid-Year Report
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I would be happy to discuss this issue with you at your convenience. Please do not
hesitate to contact me at (414) 665-2647.

Very truly yours,



Tammy M. Rooou
Treasurer, NML FEDPAC

cc: James Balagna
Sara Holm

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Federal Election Commission

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