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NAME OF COMMITTEE (In Full)
USW Works

FEC IDENTIFICATION NUMBER
C00556274

Mailing Address 60 Boulevard of the Allies

City	State	ZIP Code
Pittsburgh	PA	15222-1214

Terez Ray
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Ms. Ray:

I am writing on behalf of USW Works (the Committee) in response to your request for additional information (RAI) dated December 6, 2020, which states that the Committee's October Monthly Report (09/01/2020 – 09/30/2020) requires additional information.

The first request for additional information is as follows:

1. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Inv # 001-20 -Communication Services," "Inv # 09-13-20 - Communication Services," and "Reimbursement federal public communication costs."

The Committee is amending the October Monthly Report to clarify the descriptions mentioned above. However, we note that Schedule E of the Committee's 2018 12 Day Pre-General Report (10/01/2018 – 10/17/2018) disclosed multiple disbursements with the description "Reimburse federal public communications costs? and it was accepted without inquiry by the Federal Election Commission. The Committee reasonably believed when it submitted the 2020 October Monthly Report that the same description remained compliant.

The second request for additional information is as follows:

2. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee.

The Committee acknowledges that its September 22 48-Hour Report was briefly untimely. The \$12,409.79 of independent expenditures that were disseminated between September 4 and 18 should have been reported on September 20, so this report was filed two days late. Because that report was due, albeit unfiled, on September 20, the \$4,921.87 independent expenditure that was disseminated on September 19 was not untimely reported on September 22, as the Committee had not yet triggered the next \$10,000 48-hour reporting threshold.

The committee regrets the late filing of this report, which was entirely inadvertent and due to an internal miscalculation. We would also like to point out that the independent expenditures at issue were in connection with the presidential election, the Committee's involvement with that election was already a matter of public record due to its August 22, 2020 48-hour report, and the September 22 report was filed six weeks before Election Day. And, all told the Committee timely reported over 90% of its 2020 independent expenditures.

Yours truly,

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Gene Pasterick, Jr.
Director of Accounting and Finance
United Steelworkers
Floor 11
60 Boulevard of the Allies
Pittsburgh, PA 15222
(412) 562-2349
epasterick@usw.org