



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

APR 3 11 12 AM '97

Democracy is not a Spectator Sport

April 3, 1997

Via Certified Mail

Mr. Richard Ng
Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

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

Dear Sir:

This letter responds to your letter dated March 19, 1997, in which you asked questions about the 30 Day Post-General Report (10/17/96 -11/25/96) filed by the Philip Morris Companies Inc. Political Action Committee ("PHIL-PAC"). Responses to your questions are provided below. A copy of the relevant pages of the Monthly Report, as corrected, is enclosed.

Item #1: The totals of Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect.

Response: The above lines have been corrected. Please see the attached Detailed Summary Page and the Detailed Summary Page in PHIL-PAC's response to your request for information about the 12 Day Pre-General Report (10/1/96-10/16/96), filed this same day.

Item # 2: Provide Schedule C to report the status of the \$75,000 loan that PHIL-PAC reported during the last reporting period and Schedule B to report any payments that were made on the loan.

Response: Schedule C is attached. PHIL-PAC is not providing Schedule B because PHIL-PAC did not make any payments on the loan during the reporting period.

Item #3: Schedule B reports a \$444.81 payment to Philip Morris Management Corp. ("PMMC"), the connected organization, for a 10/30/96 in-kind contribution to Rep. T. Manton (D-NY).

Mr. Richard Ng

April 3, 1997

Page 2

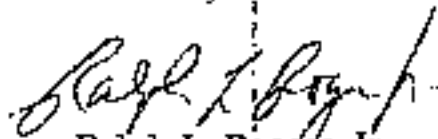
Response: PHIL-PAC made this payment to PMMC to cover the cost of certain corporate resources expended in connection with a 10/31/96 fundraising event sponsored by PHIL-PAC on behalf of Rep. Manton. PMMC did not make any contribution, in-kind or otherwise, to Rep. Manton or to any other candidate for federal office or political committee supporting a candidate for federal office. The term "in-kind contribution" as it appears in the Report refers solely to the contribution from PHIL-PAC to Rep. Manton.

Addendum

PHIL-PAC has amended Line 22 of the Detailed Summary and the corresponding Line 22 of Schedule B to reflect an additional disbursement in the amount of \$2 during the reporting period.

If you have any additional questions, or need further clarification, please contact me at (212) 878-2206.

Sincerely,



Ralph L. Rogers, Jr.
Assistant Treasurer,
PHIL-PAC

Enclosures

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

APR 8 11 13 AM '97
FEDERAL ELECTION COMMISSION MAIL ROOM

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) (PHIL-PAC) Philip Morris Companies Inc. Political Action Committee		2. FEC IDENTIFICATION NUMBER 00089136
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 120 Park Avenue	3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on 7/16/79 (date).	
CITY, STATE and ZIP CODE New York, NY 10017		

4. TYPE OF REPORT

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31

Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

Thirtieth day report following the General Election on
11/6/96 in the State of NY

(b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/17/96</u> through <u>11/25/96</u>		
6. (a) Cash on Hand January 1, 19 <u>96</u>		\$ 79,890.10
(b) Cash on Hand at Beginning of Reporting Period	\$ 71,156.71	
(c) Total Receipts (from Line 19)	\$ 57,038.97	\$ 747,261.86
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 128,195.68	\$ 827,151.96
7. Total Disbursements (from Line 30)	\$ 68,504.52	\$ 767,460.80
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 59,691.16	\$ 59,691.16
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 75,000.00	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Ralph L. Rogers, Jr. - Assistant Treasurer

Signature of Treasurer

Ralph L. Rogers Jr.

Date

3/14/97

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X

(revised 1/1/91)

**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X**

(revised 1/1/91)

NAME OF COMMITTEE Philip Morris Companies Inc. Political Action Committee		REPORT COVERING PERIOD FROM 10/17/96 TO 11/25/96	
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)		44,836.59	344,639.80
ii. Unitemized		11,566.23	312,093.70
ii. Total	(add i and ii) >	56,402.82	656,733.50
b. Political Party Committees		0.00	0.00
c. Other Political Committees (such as PACs)		0.00	0.00
d. Total Contributions	(add a iii, b and c) >	56,402.82	656,733.50
12. Transfers From Affiliated/Other Party Committees		0.00	0.00
13. All Loans Received		0.00	75,000.00
14. Loan Repayments Received		0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		7.50	492.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		0.00	8,750.00
17. Other Federal Receipts (Dividends, Interest, etc.)		628.65	6,286.36
18. Transfers from Nonfederal Account for Joint Activity		0.00	0.00
19. Total Receipts	(add 11d, 12, 13, 14, 15, 16, 17, and 18) >	57,038.97	747,261.86
20. Total Federal Receipts	(subtract line 18 from line 19) >	57,038.97	747,261.86
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share		0.00	0.00
ii. Non-Federal Share		0.00	0.00
b. Other Federal Operating Expenditures		457.71	8,173.30
c. Total Operating Expenditures	(Add a i, a ii, and b) >	457.71	8,173.30
22. Transfers to Affiliated/Other Party Committees		10,002.00	113,652.00
23. Contributions to Federal Candidates/Committees and Other Political Committees		52,944.81	608,317.40
24. Independent Expenditures (use Schedule E)		0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		0.00	0.00
26. Loan Repayments Made		0.00	0.00
27. Loans Made		0.00	0.00
28. Refunds of Contributions To:			
a. Individual/Persons Other Than Political Committees		0.00	180.00
b. Political Party Committees		0.00	0.00
c. Other Political Committees (such as PACs)		0.00	0.00
d. Total Contribution Refunds	(Add a, b and c) >	0.00	180.00
29. Other Disbursements		5,100.00	37,138.10
30. Total Disbursements	(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	68,504.52	767,460.80
31. Total Federal Disbursements	(subtract line 21 a ii from line 30) >	68,504.52	767,460.80
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)(from line 11d)		56,402.82	656,733.50
33. Total Contribution Refunds (from line 28d)		0.00	180.00
34. Net Contributions (other than loans)(subtract line 33 from 32)		56,402.82	656,553.50
35. Total Federal Operating Expenditures	(add 21 a i and 21 b) >	457.71	8,173.30
36. Offsets to Operating Expenditures (from line 15)		7.50	492.00
37. Net Operating Expenditures	(subtract line 36 from 35) >	450.21	7,681.30

SCHEDULE C
(Revised 3/60)

LOANS

Page _____ of _____ for
LINE NUMBER _____
(Use separate schedules
for each numbered line)

Name of Committee (In Full)
Philip Morris Companies Inc. Political Action Committee (PHIL-PAC)

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Crestar Bank 919 East Main Street Richmond, VA 23219	\$75,000	\$0	\$75,000

Election: Primary General Other (specify):

Terms: Date Incurred 10/5/96 Date Due 12/31/96 Interest Rate Prime % (apr) Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding:
			\$
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding:
			\$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding:
			\$

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period

Election: Primary General Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding:
			\$
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding:
			\$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding:
			\$

SUBTOTALS This Period This Page (optional)	
TOTALS This Period (last page in this line only)	75,000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME OF COMMITTEE (IN FULL) : THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE (PHIL-PAC)

A. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
KRAFT FOODS INC. PAC 3 LAKES DRIVE NORTHFIELD IL 60093	CONTRIBUTION/OTHER DISBURSEMENT FOR: PRIMARY	10/26/96	\$10,000.00
	GENERAL X OTHER (SPECIFY): WIRE TRANSFER TO KRAFT FOODS INC. PAC		
B. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
Kraft Foods Inc. PAC 3 Lakes Drive Northfield, IL 60093	CONTRIBUTION/OTHER DISBURSEMENT FOR: PRIMARY	11/01/96	\$2.00
	GENERAL X OTHER (SPECIFY): TRANSFER OF FUNDS		

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... \$10,002.00
 TOTAL THIS PERIOD (LAST PAGE THIS LINE NUMBER ONLY)..... \$10,002.00

