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October 2, 2006

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: NARAL Pro-Choice America PAC
FEC ID No. C00079541

Dear Ms. Lewis:

This is in response to your letters dated September 1 and September 22, 2006, concerning the July Monthly Report (6/1/06 - 6/30/06) and the August Monthly Report (7/1/06 - 7/31/06) of the above referenced Committee.

You inquire about expenditures for "Telemarketing Services" and "Printing," and whether these expenses constituted either in-kind contributions or independent expenditures. These expenses were for the Committee's fundraising efforts. They do not constitute in-kind contributions, and they did not contain express advocacy as defined under 11 C.F.R. 100.22 and were therefore not independent expenditures.

You also ask about the Committee's use of "best efforts" to obtain the name, mailing address, occupation and name of employer of its donors. The Committee's practice is to ask for the required information on all of the PAC solicitations via a clear and conspicuous request. If the information is not provided with the initial contribution, the Committee's practice is to ask for the information in a separate written request, within two weeks of the contribution being received. The request clearly asks for the information, without soliciting the contribution; informs the contributor of the requirements of federal law for the reporting of such information; and includes a pre-addressed post card or return envelope. If the information is not received, the Committee's practice is to send a second mailing and to make a telephone call to the donors if their contributions exceed, in the aggregate, \$200 per calendar year.

When the Committee receives information after the contribution has been reported, the Committee will file an amended Schedule A with its next regularly scheduled report listing all the contributions for which additional information was received.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Ezra W. Reese
Counsel to NARAL Pro-Choice America PAC
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