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March 31, 2015

Ben Holly
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Planned Parenthood Action Fund, ID number C90005471, Year End Report (Form 5, 10/01/2014-12/31/2014)

Dear Mr. Holly:

We are writing in response to your letter of February 26, 2015, requesting additional information regarding the Year End Report (Form 5, 10/01/2014-12/31/2014) of Planned Parenthood Action Fund (the "Action Fund").

First, the letter asks the Action Fund to amend the Year End Report to itemize donors who contributed in excess of \$200 to the organization. FEC regulations require reports of independent expenditures to disclose only those contributors to the organization who made contributions in excess of \$200 for the purpose of furthering the reported independent expenditure. 11 CFR 109.10 (e)(1)(vi). The Action Fund had no contributors who made such contributions. As we discussed in our telephone conversation on March 26, 2015, we understand that we do not need to amend the Year End Report in this case, but in the future, if applicable, we will include on quarterly reports a Form 99 note specifying that no contributor donated to the Action Fund for the purpose of furthering the reported independent expenditure(s).

Second, the letter asks for clarification regarding certain expenditures where the amounts reported on the 24-hour and 48-hour reports differed from what was reported on the subsequent quarterly reports. As we discussed by phone, we reported the amounts of these expenditures on their respective 24-hour, 48-hour and October quarterly reports based on the best information we had at the times of filing. We later learned that the actual amounts were lower than reported. Accordingly, on January 8, 2015, we filed an Amendment to the Action Fund's October 15 quarterly report to correct certain of these amounts (marked as "Correction to amount originally reported on Oct 15 Quarterly Rpt?"), and noted the remaining corrections on the Action Fund's Year End report (marked as "Correction to amount originally reported on? the respective 24 or 48 hour report).

Based on our conversation, we understand that no amendments to any of these reports are required, however, to avoid any confusion going forward, in the future we will clearly mark on quarterly reports (and amendments thereto) when corrections apply to amounts previously reported on 24 and 48 hour reports.

Very truly yours,

Zoe Segal-Reichlin
Attorney for Planned Parenthood Action Fund