

This Form 99 submission is in response to the Commission's letter dated August 27, 2008. The Committee does maintain a non-federal account, and has held such non federal account(s) in excess of 15 years. The Committee has routinely made, and reported on Schedule H3's, transfers from the Committee's non federal accounts for allocable expenditures on a routine basis. In fact, as an example, for the reporting period of January 1, 2006, through February 29, 2008, the Committee has made numerous transfers - 4/19/06 in the amount of \$20707.77, 4/20/06 in the amount of \$13979.53, 5/2/06 in the amount of \$23028.30, 5/16/06 in the amount of \$19210.58, 6/14/06 in the amount of \$5064.64, 7/13/06 in the amount of \$33123.61, 11/22/06 in the amount of \$74435.41, 1/4/07, in the amount of \$61862.15, 1/4/07 in the amount of \$12998.91, 2/15/07 in the amount of \$34754.92, 9/18/07 in the amount of \$22990.78, 11/16/07 in the amount of \$16917.72, 12/21/07 in the amount of \$25549.45, and most recently 2/26/08 in the amount of \$34050.70. All of these transfers were appropriately disclosed on Schedule H3. The Committee continues to report all allocable expenditures on Schedule H4, regardless of whether or not allocation transfers are ever made in conjunction with those expenditures. However, at no time does the committee make transfers outside the 70-day window (no more than 10 days before or 60 days after an allocated payment is made).

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