

September 20, 2007

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

Dear Ms. Lewis:

Straight Talk America (FEC ID# C00413245) is in receipt of your letters dated August 22, 2007, concerning our amended February Monthly Report received March 20, 2007 and our amended April Monthly Report, received May 20, 2007.

Both letters raise the issue of travel reimbursements received from other political committees, both federal and non-federal. These travel amounts billed (and reimbursements received) were indeed calculated in accordance with 11 CFR 100.52, as the Committee billed only the same amount as the costs it incurred on behalf of these federal and non-federal committees. Therefore, these costs met the criteria for the usual and normal charge, and there are no in-kind contributions or contributions received from unregistered organizations.

The second letter also requests clarification regarding negative entries for the receipt of apparent refunds/rebates of expenditures on Line 21(b) of Schedule B. These negative entries were non-cash credits disclosed in memo entries to support a credit card payment. Since they supported a credit card payment appearing on Line 21(b) of Schedule B and did not affect cash, they were not disclosed on Line 15 of Schedule A.

Finally, the second letter requests clarification of administrative expenses. The Committee has greatly curtailed its activities in the current election cycle, thus its administrative expenses have been minimal. The Committee's sole employee utilizes a portion of her home and equipment to perform the bulk of the administrative work for the Committee. She bills the Committee periodically for her out-of-pocket expenses including rent, utilities, copying, telephone, and other expenses. The Committee's payments to her have been disclosed on Schedule B, Line 21(b). No entity or individual has incurred or paid any undisclosed administrative expenses on behalf of the Committee.

Sincerely,

Keith Davis
Treasurer