

November 30, 2006

Daniel T. Buckley
Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00422188

Reference: October Quarterly Report (7/1/06-9/30/06)
12-Day Pre-General Report (10/1/06-10/18/06)

Dear Mr. Buckley,

This letter is in response to your requests for additional information, dated November 1, 2006 and November 22, 2006.

Your letters indicate that the Committee disclosed payments from federal candidate committees for goods and/or services provided by ABC PAC. All payments were reimbursements for credit card processing fees and were charged at the usual and normal commercially reasonable rate. No in-kind contribution occurred from ABC PAC as a result of these charges.

Your letters question the disbursement of earmarked contributions outside the permissible time period. All earmarked contributions were received via credit card through the ABC PAC website. In order to standardize reporting, the Committee reported the date of receipt as the date that the contributor made a pledge on the website. ABC PAC did not have access to these funds until 5-6 days after the contributor's data entry date on the website. All earmarks were forwarded within 10 days after ABC PAC received and had access to the funds. In the future, to avoid any confusion, ABC PAC will make disbursements of all earmarks on a weekly basis.

Your letters indicate that ABC PAC discloses limited administrative expenses. ABC PAC does not have rent or salaried employees. The Committee has reported all administrative expenses, either on Schedule B, Line 21b or as outstanding debt on Schedule D. The Committee has not received any goods or services in the form of in-kind contributions.

Both above referenced reports have been amended to properly disclose Offsets to Operating Expenditures on Schedule A, Line 15. These were originally reported in error on line 14.

Sincerely,

Lisa Lisker
Treasurer
