

August 6, 2007

Mr. Christian Hilland
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Hilland:

Romney for President, Inc. (hereinafter "RFP"), FEC ID# C00431171, is in receipt of your Request for Additional Information (RFAI) dated July 5, 2007, referencing the April Quarterly FEC Report (1/1/07 - 3/31/07). Thank you for your questions and suggestions. RFP takes seriously our compliance and disclosure obligations and has established internal processes and controls to ensure full compliance with all relevant Federal regulations. Our response to your RFAI is as follows:

Schedule A-P

In accordance with 11 CFR 110, and as a part of its regular contributions screening process, RFP reviews each contribution received for possible regulatory related issues. All contributions received by RFP that exceed the contribution limits are reattributed, redesignated or refunded in full agreement with the procedures and time frame limits set forth in 11 CFR 110.1(k)(3)(ii)B, 11 CFR 110.1(b)(3)(i), and 11 CFR 110.1(b)(3)(i). As noted in the RFAI, RFP takes the additional step of noting, via memo text language associated with each such transaction entry, that the committee is taking all reasonable actions to remedy any potential contribution limit issue.

RFP has examined the donors listed in the attachment entitled "Possible Excessive and/or Prohibited Contributions," and with respect to the donors listed below, has found it necessary to adjust their contribution amounts and the amounts of contributions from their spouses. These changes are reflected on the amended April 2007 Quarterly report filed on August 6, 2007. The page reference from the amended April 2007 Quarterly report is provided following each donor's name.

1. Burton, Kent and Winnis (Pages 616 and 618)
2. Cameron, Michael and Camille (Pages 655 and 656)
3. Knudsen, Judith and Peter (Pages 2412 and 2413)
4. Robinson, Timothy and Holly (Pages 3749 and 3750)

In addition, for the donors listed below, RFP has adjusted their aggregate contribution amounts and, as of the date of this letter, has now refunded any excessive portion of their donation within the time frame permitted by 11 CFR 103.3(b)(2). This action will be reported in the committee's next regularly scheduled public disclosure report.

1. Christensen, Keith
2. Farbman, Burton
3. Harpootian, John
4. Hillyard-Lazenby, Margaret
5. Johns, William
6. Knowlton, Richard
7. Suelthaus, Kenneth

ETEXT ATTACHMENT

- 8. Sugarman, Ainslie
- 9. Tierney, Dan

The remaining donors on the list entitled "Possible Excessive and/or Prohibited Contributions" are, in fact, unique donors and therefore were reported correctly on the April 2007 Quarterly report.

Finally, with the exceptions as noted below for the donors named on the lists entitled "Excessive Contributions Designated as Future Reattributions" and "Excessive Contributions Designated as Future Refunds," the committee's July 2007 Quarterly report shows that the contributions referenced in the RFAI have now been reattributed to a spouse or have been refunded within the guidelines set forth in 11 CFR 110. For the donors listed below, the excessive portions of their contributions have been refunded as of the date of this response as permitted by 11 CFR 103.3(b)(2) and will be reported in RFP's next regularly scheduled public disclosure report.

- 1. McWaters, Jeffrey
- 2. Munisteri, James
- 3. Richter, Lawrence
- 4. Sheets, John

Schedule B-P

With respect to the four transactions referenced in the RFAI, the disbursements are accurately described and RFP believes that it is in full compliance with 11 CFR 104.9, 11 CFR 104.3(b) and specifically 11 CFR 104.3(b)(3)(i)(B). Consequently, no amendment is necessary relative to these transactions. Please note that there is no Statutory authority, nor has the Commission provided any guidance in the Regulations relative to disbursements reporting or in the Commission's recent Statement of Policy on "Purpose of Disbursement" Entries for Filings With the Commission, 72 Fed. Reg. 887 (2007), for your proposition that the amount of a disbursement transaction affects the description assigned to a particular disbursement. If there is guidance that we are unaware of, we would appreciate your providing it to us.

Schedule C-P

The committee has included the omitted information relative to "Date due" in the amended April 2007 Quarterly report.

Line 17(d), Detailed Summary Page

The committee has amended Line 17(d) of the Detailed Summary Page on the amended April Quarterly report to include the omitted information.

Conclusion

If you have any questions or concerns regarding this response or our submissions, please do not hesitate to contact me at (857) 288-6414.

Sincerely,

Charles R. Spies
Assistant Treasurer