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July 1, 1994

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HAND-DELIVERED

Ms. Erica Holder
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Room 709
Washington, DC 20463

RE: DIRECT MARKETING ASSOCIATION POLITICAL ACTION
COMMITTEE; MARCH MONTHLY REPORT (02/01/93-02/28/93)

Dear Ms. Holder:

This constitutes the Direct Marketing Association Political Action Committee's ("DMA PAC") response to your correspondence in connection with the above-referenced report.

In your letter dated June 15, 1994, you request that DMA PAC demonstrate that a \$1,000 contribution it received on February 5, 1993 from the American Bankers Insurance Group ("ABIG") consisted of permissible funds under the Federal Election Campaign Act ("the Act").

To ensure that DMA PAC's initial determination that the contribution from ABIG PAC -- a political action committee registered in the state of Florida -- was permissible, on June 30, 1994, Peter Sherman of our firm contacted Bonnie Blackburn, senior vice president of ABIG and a member of the board of ABIG PAC, by telephone to obtain details about the

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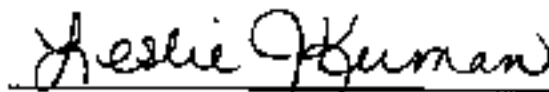
Ms. Erica Holder
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contribution. Ms. Blackburn stated that the \$1,000 contribution made to DMA PAC was the only contribution made to a federal committee during the 1993 calendar year. Ms. Blackburn also stated that all contributions made to ABIG PAC are voluntary contributions made by individuals. Ms. Blackburn assured Mr. Sherman that ABIG PAC does not accept contributions from other federal political committees, corporations, labor unions, or any other sources prohibited from making campaign contributions pursuant to the Act.

Based on the information available to DMA PAC, and later corroborated by Ms. Blackburn, DMA PAC determined that ABIG PAC (i) was not required to register as a political committee before making the contribution, (ii) had sufficient funds permissible under the Act from which to make the contribution, and (iii) was permitted to make the contribution to DMA PAC under the Act.

If you have any questions, feel free to contact me at (202) 861-1877.

Sincerely,



Leslie J. Kerman
Counsel

Direct Marketing Association Political Action Committee

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Federal Election Commission
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