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December 17, 2015

Kaitlin Seufert  
Report Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Identification Number: C00571372

Reference: 48-HOUR NOTIFICATION REPORT, FILED 10/23/2015

Dear Ms. Seufert:

This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated November 12, 2015, concerning Right to Rise USA's ("RTR") 48-Hour Independent Expenditure Report filed on October 23, 2015. In the RFAI, RAD requests that RTR "amend the 48-Hour Report by providing the state" for two national cable independent expenditures made on October 21, 2015. These were expenditures for a national cable media buy on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such a buy on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements.

Please feel free to contact me if you have any additional questions concerning this matter.

Sincerely,

Charles R. Spies  
Treasurer

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