18 BRIDGE STREET • CORLISS LANDING PROVIDENCE, R.I. 02903 PHONE: (401) 453-4100 • FAX: (401) 453-0066

RECEIVED PEDERAL SECCION CENTROSIGN POBLIC BASCLOSURE DIVISION

97 APR 22 PM 4: 28

John A. Holmes, Jr., Chairman

March 24, 1997

Federal Election Commission Attn: Andrea Wilkens, Reports Analyst 999 E Street, NW Washington, DC 20463

## Dear Andrea:

This letter is in response to your inquiry dated March 19, 1997, copies of which are attached, regarding the Federal Election Commission reports of the Rhode Island Republican State Central Committee (JD# C00078196).

Specifically you inquired about the 12 Day Pre-General Report (10/1/96 - 10/16/96) and the 30 Day Post-General Report (10/17/96 - 11/25/96). Since both letters refer to basically the same information, please allow me to respond to them simultaneously.

On Schedule D we do report a debt to the Non-Federal Account for \$8,041.79. This debt has been consistently reported on our reports going back to at least 1987, prior to the inception of the current rules for administrative expenses. Prior to 1991 the Federal Election Commission allowed non-federal accounts to pay the full administrative expenses and transfers be made from the federal account to cover the federal share. When the new rules took effect, the Federal account still had an outstanding debt of \$106,476.77. Being a Party with little federal activity it was impossible to repay the debt immediately. Over the course of the last 6 years the Party has consistently made payments to the non-federal account to reduce this debt and hopes to eliminate it by years end.

In regard to our Event Year To Date totals for administrative and fundraising costs, we have been reporting our totals in the same manner since at least 1989, when the person responsible for completing the required FEC forms was first hired. This is the first request we have had to change our method of reporting and we will be glad to comply with your request in our subsequent filings.

As relates to your inquiry regarding limited payments for administrative expenses and the use of the Ballot Composition Method, I have attached a copy of form H1 that we filed with our first report last year. All of our administrative expenses were allocated according to this method and reported on form H4 when paid. All unpaid expenses were reported on Schedule D.

On our 12 Day Pre-General Report the payment to the Providence Marriott was for a fundraising event, specifically the Quayle Event, as described on the report

On our 30 Day Post General Report form H2 is enclosed to show that fundraising events held prior to the reporting dates were still being allocated under the same ratio as had been previously reported. This form was included for information purposes only since non-federal account transfers to cover the costs of these events were shown on form H3. There were no corresponding disbursements during this period. (The disbursements were reported on the previous report, the 12 Day Pre-General Report.)

If there is any further information you need, please do not hesitate to contact either myself or Richard Scarpellino at the R.I. Republican Party office at (401) 453-4100.

Sincerely,

Margaret Coughlin

Treasurer

## METHOD OF ALLOCATION FOR SHARED FEDERAL AND NON-FEDERAL ADMINISTRATIVE EXPENSES AND GENERIC VOTER DRIVE COSTS

AE OF COMMITTEE				
R.I. Republican State Central Committee				
NATIONAL PARTY COMMITTEES  FIXED FEDERAL PERCENTAGE (CHECK THE APPROPRIATE LINE AND ENTER % IN 20X TO RIGHT)				
(3) ALL OTHER YEARS (60%)				
HOUSE AND SENATE PARTY CAMPAIGN COMMITTEES				
☐ MINIMUM FEDERAL PERCENTAGE (65%) (IF CHECKED, ENTER 65% IN BOX TO RIGHT)				
T FUNDS EXPENDED:  • ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL				
ADJUSTMENTS TO FUNDS EXPENDED:  ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL				
NOTE; FUNDS EXPENDED MUST BE USED IF THE FEDERAL PROPORTION IS GREATER THAN 65% IN ANY YEAR.				
SEPARATE SEGREGATED FUNDS AND NON-CONNECTED COMMITTEES				
FUNDS EXPENDED:  • ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL				
ADJUSTMENTS TO FUNDS EXPENDED:  ACTUAL DIRECT CANDIDATE SUPPORT — PEDEPAL				
STATE AND LOCAL PARTY COMMITTEES				
BALLOT COMPOSITION  CHECK ALL OFFICES APPEARING ON THE NEXT GENERAL ELECTION BALLOT:  NUMBER OF PONTS				
1. PRESIDENT				
4. SU670TAL → FEDERAL (ADD 1, 2, AND 3)				
5. GOVERNOR				
11. SUGTOTAL — NON-FEDERAL (ADD 5, 5, 7, 8, 9, AND TO)				
FEDERAL ALLOCATION = LINE 4 DIVIDED BY LINE 12				

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## Federal Election Commission

## ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

NOW It was received.			
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	Received from the Senate Office of Public Records	DATE OF RECEIPT	
	Other (Specify):	POSTMARKED	
		and/or DATE OF RECEIPT	
J	es	4-22-97	
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