

October 1, 2007

Kristin DeCarmine
Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. DeCarmine:

Re: Commonwealth PAC's (C00403022) 2007 Mid-Year Report (1/1/2007 to 6/30/2007)

This letter is written in response to the Federal Election Commission's Request for Additional Information dated August 29, 2007 regarding the Commonwealth PAC's ("PAC") 2007 Mid-Year Report.

1. The PAC assessed the "usual and normal charge" for the goods provided to the federal candidate committee. In order to ensure that the usual and normal charge was assessed, we conducted research among multiple vendors to determine the full retail cost of the equipment if bought new and then researched the usual and normal price if bought used. The materials at issue were used and through research and consultation with the buyer, Internet, and PAC consultants we determined the usual and normal charge. The cost for the "furniture purchase" referenced on the FEC Report, for example, equaled \$1,094.80. However, the equipment not only had belonged to the Commonwealth Federal PAC, but was also shared by five additional Commonwealth State PACs. The Federal PAC pays and accepts 50% of all pro-rated expenses and receipts; therefore, it paid 50% of the final cost and accordingly reported the total paid of \$547.50.
2. All expenditures reported on Schedule B for "Pro-Rated Catering", "Pro-Rated Dec. Catering," "Pro-Rated Dec. Event Expenses," "Pro-Rated Event Catering", "Pro-Rated Event Catering," Pro-Rated Event Consulting," "Pro-Rated Event Expense" and "Pro-Rated Fundraising Consulting" were for Commonwealth PAC related fundraising. None of these disbursements were made on behalf or for the benefit of any specifically identified federal candidate or candidates.
3. All of the expenditures reported on Schedule B for "Pro-Rated Photographer," "Pro-rated Photography" and "Pro-Rated Printing" and similar expenditures were made for Commonwealth PAC related events and meetings. None of these disbursements were made on behalf or for the benefit of any specifically identified federal candidate or candidates.

If the Commission requires any further clarification or filings on these matters, please contact me at 202-862-5040.

Sincerely,
Elizabeth Anderson
Treasurer
