

ETEXT ATTACHMENT

06/28/2004 15 : 25

Ms. Maureen Benitz
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

June 28, 2004

Re: The Procter & Gamble Company Good Government Cmte (Identification Number:C00257329)
May Monthly Report (4/1/04-4/30/04)

Dear Ms. Benitz:

This letter responds to your letter dated June 9, 2004 concerning the \$6,000 receipt from the Procter & Gamble Company Good Government Committee - California (Procter & Gamble Company GGC-CA). We felt that the explanation in the memo field for this itemized receipt on page 12 of the report would sufficiently describe the permissibility of the funds; however, your letter indicates that the Commission believed this transfer to be a corporate contribution from the Procter & Gamble Company itself.

In accordance with your directions to Ken Davis in a telephone conversation last week, we are providing you with this written affirmation that the \$6,000.00 receipt represents funds from an affiliated state PAC registered with the State of California. The California PAC was funded only by transfers from this Committee. These funds, therefore, were raised solely from sources and in amounts permissible under federal regulations.

Essentially, this transfer is a refund of unused funds originally transferred to the California PAC on April 13, 1999. Furthermore, though the transfer from the California PAC is greater than \$1,000.00, the California PAC will not be required to register with the FEC as a political committee under 11 CFR 100.5, because the transfer represents the dispensation of the PAC's funds. It will terminate its registration with the State of California within the month.

I trust that this letter adequately responds to your request. However, if you have any questions, or if anything further is required of the Committee, please feel free to telephone Ken Davis at (703) 684-2915.

Sincerely,
Jeffrey A. Lane
Assistant Treasurer
The Procter & Gamble Company Good Government Committee