

MISCELLANEOUS TEXT (FEC Form 99)

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March 14, 2012

Mr. Christopher Whyrick
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE:Supplemental Response to RFAI on 2010 Year End Report
League of Conservation Voters, Inc.: C90005786 (LCV)

Dear Mr. Whyrick:

The League of Conservation Voters, Inc. (LCV) appreciates the opportunity given to supplement our February 9, 2012 response to your January 5, 2012 letter requesting additional information regarding certain independent expenditures made by LCV during the fourth quarter of 2010.

As we discussed last week, you have indicated that LCV's explanations regarding the correct reporting of six of the independent expenditures in question were sufficient and are no longer at issue. In terms of the nine remaining independent expenditures in question, LCV would respectfully submit three additional points to supplement its February 9, 2012 response:

1. The nine independent expenditures represent, in aggregate, a total of \$32,902.17. LCV made independent expenditures of \$4,026,448.67 in 2010, meaning that these nine expenditures represent less than one percent (.008%) of LCV's 2010 independent expenditure activity. While LCV strives for 100% accuracy, reporting of independent expenditures on a 24 and 48 hour basis represents one of ? if not the -- most intensive compliance requirements under federal election law.

Moreover, as detailed in our February 9, 2012 response, four of the expenditures -- representing \$30,460 of the \$32,902.17 -- were reported in timely fashion on 24 or 48 hour reports. Due to an administrative error in communicating the correct LCV entity to our compliance vendor, however, they were reported on the 24 or 48 hour report as having been made by the League of Conservation Voters Action Fund, LCV's connected PAC. While LCV's regrets this error, LCV wishes to stress that it fully complied with the spirit of the FEC's disclosure regulations by reporting these expenditures on a timely basis so the public would have knowledge of our independent activities.

The remaining five expenditures that were not disclosed on a LCV 24 hour report but were disclosed on LCV's Year End 2010 report represented a de minimus amount -- \$2,442.17 or roughly 1/20th of one percent (.0006%) -- of LCV's 2010 independent expenditure activity. In each instance, the expenditure in question was not conveyed in timely fashion by LCV's field operations to its headquarters staff as part of other expenditures that were timely conveyed and reported. In the three races in question in which the independent expenditures occurred, LCV did file 24 hour reports at the time of the expenditures, meaning the public was not deprived of the knowledge that LCV was engaged in independent expenditure activity in those races. Finally, while LCV regrets the errors, it would note that its field and headquarters staff logged approximately 1,600 separate expenditure entries in 2010 as part of LCV's independent expenditure reporting. Again, while LCV strives for perfection in its FEC reporting, such perfection is not always obtainable given the volume and intensity of the reporting regime requirements.

2. The mistakes in question were all identified by LCV at its own initiative following the election and then correctly reported by LCV as part of its Year-End (4th Quarter) report. A committee or organization's sua sponte self-reporting should be taken into account when assessing its compliance. See FEC Policy Regarding Self-Reporting of Campaign Finance Violations, 72 FR 16696 (April 7, 2007).

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3. Finally, LCV has spent considerable time and organizational efforts since the 2010 elections working to improve some of the processes by which its field, headquarters and compliance vendor convey and report independent expenditure information to the FEC. Key LCV staff have attended FEC trainings as well as conducted internal trainings for other staff, and LCV has worked closely with its outside compliance vendor to better utilize technology to decrease the likelihood of human error as it undertakes its 2012 compliance efforts.

Your consideration of these additional explanations is appreciated.

Sincerely,

Patrick Collins, Senior Vice President, Finance & Administration
League of Conservation Voters, Inc.
