

May 4, 2010

Ms. Alexandra T. Broomhead
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Broomhead:

Country First PAC (FEC ID# C00457705) is in receipt of your Request for Additional Information dated March 26, 2010, regarding the Committee's 2009 Year-End FEC report.

Concerning the reimbursements from three federal campaigns for list rentals, the Committee can as you requested confirm that these reimbursements were made at fair market value, and thus represent the usual and normal charge. Accordingly, there is no in-kind donation with respect to these receipts.

The payments referenced in your letter for Postage, Printing, and for Fundraising Phone Calls were operating, fundraising, and administrative payments solely benefiting and on behalf of Country First PAC. As such, they were not made on behalf of any specifically identified federal candidates, nor did they constitute public communications or voter drive activity containing express advocacy. Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B or Schedule E for lines 23 or 24.

Sincerely:

Keith A. Davis, Treasurer
Country First PAC
