

Via Electronic Filing

Vickie Sue Davis
Senior Campaign Finance Analyst
The Federal Election Commission
999 E Street, NW
Washington, DC 20463

In RE: NARAL Pro-Choice America PAC (C90004185)
Year End Report (2007)
Amended April Quarterly Report (2008)
July Quarterly Report (2008)
October Quarterly Report (2008)
Year End Report (2008)

Dear Ms. Davis:

This is in response to your letter of May 19, 2009 concerning the above referenced reports for NARAL Pro-Choice America independent expenditures.

You express concern that several disbursements disclosed in the committee's 24 and 48-hour reports differ in from the amounts disclosed on the above referenced reports. The reason for any discrepancies between the 24/48-hour reports and their related quarterly filing is that the 24/48-hour reports showed estimated amounts while the amounts shown in the quarterly reports were actual amounts. By reporting estimated amounts on the 24/48-hour reports and actual amounts on the quarterly reports, NARAL Pro-Choice America is following the guidance of the Commission as found in its Explanation and Justification of independent expenditure reporting. See Independent Expenditure Reporting, 67 Fed. Reg. 12,834, 12,838 (Mar. 20, 2002).

It is hoped that the above is responsive to your concerns. Please be in touch should you have additional concerns or questions.

Sincerely,

John Botts
Treasurer
