



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Rod Connor, Treasurer
Gaylord Entertainment Company
Political Action Committee
One Gaylord Drive
Nashville, TN 37214

APR 28 2000

Identification Number: C00183707

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Connor:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please amend Schedule B supporting Line 23 by providing the state and congressional district, if applicable, for each contribution made to a federal candidate or political committee. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule A supporting Line 11(1)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis

Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen". The signature is written in dark ink on a white background.

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$80 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$185—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$80), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

SCHEDULE A		ITEMIZED RECEIPTS		Use separate entries for each month of the calendar year.		FORM OF	OF
Contributions from Individuals				FORM LAST NUMBER		11 (a) (ii)	
<small>Any information reported from such Records and Statements may not be used or used by any person for the purpose of soliciting contributions or for committee purposes, other than using the name and address of any political committee to solicit contributions from such committee.</small>							
NAME OF COMMITTEE (in full) National Organization PAC 000000001							
1. Full name, mailing address and ZIP Code Anna Sullivan 81 18th Street City, State ZIP		Name of Employer National Organization, Inc.		Date (month, day, year) payroll deduction		Amount of Each Receipt (in full) \$80.00	
Received For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse Date received:		Occupation Branch Manager		Year-to-date total \$285.00		Amount of Each Receipt (in full) (\$15 biweekly)	
2. Full name, mailing address and ZIP Code Rodney Jones 881 Eastbury Road City, State ZIP		Name of Employer National Organization, Inc.		Date (month, day, year) payroll deduction		Amount of Each Receipt (in full) \$120.00	
Received For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse Date received:		Occupation Vice President		Year-to-date total \$285.00		Amount of Each Receipt (in full) (\$20 biweekly)	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

