

April 19, 2008

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

Dear Mr. Jones:

Rock City PAC (FEC ID# C00436410) is in receipt of your Request for Additional Information dated March 21, 2008, concerning the PAC's 2007 year-end FEC report.

The PAC does not have office space or salaried staff. Minimal administrative expenses (below the itemization threshold) for telephone, postage, and delivery are included in a fundraising consulting payment to Kaegi Resources made in January 2008 that will be disclosed on our first quarter 2008 report. No payments were or are being made by any connected organization, there were no in-kind contributions received, no other expenditures have been incurred in this reporting period, and all expenses incurred have been reported.

The payments for "GOP Senators Lunch" and for "Event Expense" were for meals and catering expenses in connection with Rock City PAC meeting and fundraising activities. None of these expenditures were made on behalf of specifically identified federal candidates, and these disbursements are properly disclosed as operating expenditures on Line 21b. No Schedules B or E for Lines 23 or 24 are required with respect to these disbursements.

Similarly, the payment for "List Development" was an expense solely for the benefit of the PAC. As such, it contained no express advocacy, and did not constitute an expenditure for public communications or voter drive activity. Therefore, it did not qualify as an in-kind or an independent expenditure, and is appropriately disclosed on Line 21b.

Sincerely,

Kimberly Kaegi, Treasurer  
Rock City PAC

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