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November 20, 2012

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

Re: Requests for Additional Information for Amended August Monthly Report NEA Fund for Children & Public Education, ID# C00003251

Dear Mr. Morse:

In a letter dated October 24, 2012, you requested additional information to clarify why The NEA Fund for Children and Public Education (?FCPE?) filed an amended August report on September 20, 2012 documenting \$10,806.05 in contributions which were not accounted for on the previous report. This letter is intended to respond to that request.

As the FCPE noted in that amended report:

This amended August Monthly report discloses additional receipts and disbursements totaling \$10,806.05 that were not disclosed on the original report. The previously unreported receipts and disbursements are in-kind contributions FCPE received at the annual convention of its connected organization, the National Education Association (NEA), that was held from June 27 to July 5, 2012. The task of processing these in-kind contributions for recordkeeping and reporting purposes was assigned to an outside vendor, which did not complete the task in time for the filing of the August monthly report. Consequently, the FCPE has to file the amended report in question to disclose those in-kind contributions.

The FCPE?s original August report was 1540 pages long. The extreme length of this report was a result of the disclosure of thousands of small contributions made at the NEA annual convention. The demands of processing these contributions in-house have led FCPE to the use of this outside vendor to process the 166 in-kind contributions received at the convention. Unfortunately, by the time documentation was given to the outside vendor and processing was complete, the August report had been completed and submitted.

Accordingly, an amended report was promptly filed disclosing on Line 11(a), an additional \$10806.05 in receipts, to account for these in-kind contributions. In compliance with FEC reporting guidelines for an in-kind contribution, because there is no monetary gain from the transaction, Line 21(b) of the report also notes a disbursement of \$10,806.05 to balance Line 11(a).

The delay reflected in this reporting was a result of a good faith effort on the part on FCPE to ensure that all receipts are reported accurately and in a timely fashion, complying with the Federal Election Campaign Act. We will continue to refine and improve our contribution processing procedures to prevent such reporting delays in the future.

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If you have any additional questions or concerns, please feel free to contact us at (202) 822-7041.

Sincerely,

Jason Walta
Nicholas Mueller*
Legal Counsel for The NEA Fund for Children and Public Education

cc: Michael McPherson, Treasurer, NEA Fund for Children and Public Education

*Law Fellow. Admitted only in Virginia; practice limited to matters before federal agencies and providing advice as internal counsel.
