

May 19, 2008

Erinn D. Larkin
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Qualcomm Inc. Political Action Committee's March Monthly Report (1/1/08-2/29/08),
Identification No. C00339085

Dear Ms. Larkin:

This letter responds to your letter of April 23, 2008, concerning Qualcomm Inc. Political Action Committee's ("QPAC") March Monthly Report. In your April 23rd letter, you request information regarding several contributions by QPAC to the Texans for Senator John Cornyn, Inc. Committee ("Cornyn Committee") which, taken together, appear to exceed the limits set forth in the Federal Election Campaign Act ("FECA"), 2 U.S.C. 441a(a). In its Federal Election Commission disclosure reports, QPAC erroneously identified the November 17, 2005 and October 19, 2006 checks to the Cornyn Committee as contributions for the general election. In fact, neither check was designated in writing on the face of the check for a particular election, nor was either check accompanied by a transmittal letter containing any written designation.

Under Federal Election Commission regulations, a contribution not designated in writing by the contributor for a particular election is treated as having been made for the next election for that office. See 11 C.F.R. 110.2(b)(2)(ii).

Senator Cornyn was not on the ballot in 2006 and consequently, the next election for office after these contributions were made was the primary election on March 4, 2008. The Cornyn Committee correctly reported both of these contributions as having been made for the primary election.

To accurately reflect its contributions to the Cornyn Committee, QPAC will amend its 2005 Year-End Report of Receipts and Disbursements to indicate that the November 17, 2005 contribution was designated for the primary election. QPAC will also amend its 2006 Post-General-Election Report of Receipts and Disbursements to indicate that the October 19, 2006 contribution was designated for the primary election. These amendments will reflect that QPAC's contributions to the Cornyn Committee during the 2008 election cycle are, in fact, within FECA's contribution limits.

Please feel free to contact me at (202) 263-0099 if you have any questions.

Sincerely,
Jonas E. Neihardt,
Treasurer

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ETEXT ATTACHMENT
