

ETEXT ATTACHMENT

04/22/2002 14 : 53

Mr. John Gibson, Assistant Staff Director
Mr. Jim Krebs, Reports Analyst
Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

FEC ID#: C00016683/RQ-3

March Monthly, April Monthly, May Monthly, June Monthly July Monthly, August
thly, September Monthly, November Monthly (2001) Reports

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Dear Messrs. Gibson and Krebs:

We are in receipt of your letter dated February 7, 2002, which presented unique questions regarding Pfizer's FEC reports. This letter and the attached amendments are intended to respond and further clarify these inquiries.

The first paragraph of the second "Request for Additional Information" (RQ-2) dated January 16, 2002 suggests that Pfizer's federal PAC may have made disbursements that would have caused the committee to allocate expenses pursuant to 11 CFR ss. 106.5 and 106.6. In conversations with Mr. Dodson of your office, we explained that the Pfizer PAC had not engaged in any activities, such as joint fundraising or "get out the vote" efforts that would trigger allocation of expenses between federal and non-federal accounts. The items in question are direct transfers from our federal PAC to our non-federal PACs for legal purposes, as clearly indicated on the FEC reports noted above.

Mr. Dodson also indicated that, upon reviewing this letter, no additional FEC inquiries would be sent to Pfizer in situations where, as here, the company's PAC has fully complied with its obligations by disclosing direct transfers to non-federal PACs and accurately reporting them on Schedule B, line 29. Should an occasion arise where allocation is required, we will submit the proper reports in a timely manner.

As a final note, with respect to direct transfers from Pfizer's federal PAC to affiliated non-federal committees, we have been providing the FEC with identical disclosure information on past reports for several years, without incident. According to Mr. Krebs, a new policy instituted by RAD resulted in our receipt of this letter, rather than any departure from past reporting practices. In the future, we would appreciate receiving notification of any changes in FEC reporting policies and procedures so that we may continue to remain in full compliance of the Federal Election Campaign Act and FEC regulations.

The attached amendment regarding the date of debt retirement contributions reported on our March monthly report was filed electronically and verified on 2/26/02.

We hope this clarifies our inquiry. Please feel free to contact us with any additional questions or comments.

Sincerely,

Richard A. Passov
Treasurer