



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 7, 2012

ROYAL E. BROWN, TREASURER
INDEPENDENCE BLUE CROSS PAC (IBC
PAC)
1901 MARKET STREET
PHILADELPHIA, PA 19103

Response Due Date
01/11/2013

IDENTIFICATION NUMBER: C00450056

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2012 - 10/17/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

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Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1164.

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Sincerely,

A handwritten signature in black ink that reads "Nicole Miller". The signature is written in a cursive, flowing style.

Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division

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Inadequate Employer/Occupation Entries
Independence Blue Cross PAC (IBC PAC) (C00450056)

Employer	Occupation
AmeriHealth Mercy	Information Requested
AMFC	Information Requested
Information Requested	Assoc Deputy Gen. Counsel
Information Requested	Broker Exec-N
Information Requested	Corp Relations Coordinator
Information Requested	Deputy Gen Counsel
Information Requested	Dir Consult Bus Svcs
Information Requested	Dir Customer Relationship Mgmt
Information Requested	Dir Data Warehouse Operations
Information Requested	Dir E-Business Devel
Information Requested	Dir Mktg Sales Admin-Medicare
Information Requested	Dir Patient Care Management
Information Requested	Dir Processing Svc
Information Requested	Dir Prov Performance Programs
Information Requested	Mgr Account Reporting
Information Requested	MGR CMS Revenue & Analyst
Information Requested	Mgr CPN Bus Mgmnt
Information Requested	Mgr Operations
Information Requested	Mgr Sales AHA-N
Information Requested	Mgr. Reporting and Analysis
Information Requested	Product Mgr
Information Requested	Project Specialist-Corp Strat
Information Requested	Provider Auditor II
Information Requested	Sales Administration Manager
Information Requested	Sr Account Executive-R
Information Requested	Sr Counsel
Information Requested	Sr Dir Sol Des & Devel
Information Requested	Sr Info Security Risk Analyst
Information Requested	Sr. Org Development Spec
Information Requested	Strategy Director
Information Requested	SVP&Chief Informatics Officer
Information Requested	SVP&ChiefCommunicationsOfficer
Information Requested	VP & Deputy General Counsel
Information Requested	VP Business Development
Information Requested	VP Contracting & Reimbursement
Information Requested	VP Customer Service
Information Requested	VP Finance - AHA
Information Requested	VP Government Affairs & DGC
Information Requested	VP Human Resources
Information Requested	VP IS Business Management
Information Requested	VP IS-AHA

Inadequate Employer/Occupation Entries
Independence Blue Cross PAC (IBC PAC) (C00450056)

Employer	Occupation
Information Requested	VP Medical Management
Information Requested	VP Product Services
Information Requested	VP Sales