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April 13, 2012

Michelle Grant  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington D.C. 20463

Re: ID number C30001945, FEC Form 9, filed 2/1/12

Dear Ms. Grant:

We have received your letter of March 9 requesting additional information in regard to the FEC Form 9 filed by the Planned Parenthood Action Fund, Inc. (?Action Fund?) on February 1, 2012.

Question 1 of your letter asks for disclosure of the person or persons who shared or exercised control over the reported electioneering communication. That information is included in the amended Form 9 filed this date.

Question 2 of your letter asks for the name of certain donors to the Action Fund. However, no reporting of donors is required in regard to the reported electioneering communication.

11 CFR 104.20(c)(9) states that in the case of an electioneering communication made by a corporation pursuant to section 114.15 (defining permissible electioneering communications by corporations), that was not paid for exclusively from a segregated bank account, the corporation must report only those donors who made contributions ?for the purpose of furthering electioneering communications?since the first day of the preceding calendar year.? See Van Hollen v. FEC, No. 11-0766, -- F.Supp.2d --, 2012 WL 1066717, at \*5 (D.D.C., March 30, 2012), citing the FEC?s ?Explanation and Justification for Final Rules on Electioneering Communications,? 72 Fed. Reg. 72899, 72911 (Dec. 26, 2007) (stating rule requires corporations to disclose ?funds received only from those persons who donated?specifically for the purpose of furthering [electioneering communications]??.?).

The reported communication at issue was made by a corporation, the Action Fund, pursuant to 11 CFR 114.15 and was not made using segregated funds. Moreover, the Action Fund had no donors who made contributions for the purpose of furthering electioneering communications since the first day of the preceding calendar year. Therefore, no reporting of donors is required in regard to this communication.

Please contact me if you need any further information.

Yours sincerely,

Deirdre Schifeling  
Political and Organizing Director  
Planned Parenthood Action Fund