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NAME OF COMMITTEE (In Full)  
FREEDOM PARTNERS CHAMBER OF COMMERCE INC.

FEC IDENTIFICATION NUMBER  
C90016692

Mailing Address 2300 Wilson Blvd  
5th Floor

City State ZIP Code  
Arlington VA 22201

Vicki Davis  
Senior Campaign Finance Analyst  
Federal Election Commission, Reports Analysis Division  
(202) 694-1155

May 3, 2018

Dear Ms. Davis:

We are writing in response to your Request for Additional Information regarding our 2017 Year-End Report.

You requested additional information pertaining to two items:

1. You requested additional information pertaining to the fact that this report discloses disbursements made for independent expenditures, but no contributions made to further the independent expenditures. As you note, persons who are not political committees but who make independent expenditures must identify each person who makes a contribution in excess of \$200 for the purpose of furthering the reported independent expenditure. 11 C.F.R. 109.10(e)(1)(vi). Freedom Partners Chamber of Commerce ("Freedom Partners") received no such contributions, and therefore had no contributions to report. Further, we challenge the assumption that, simply because we reported disbursements, there were also contributions that should have been reported.

2. You requested additional information pertaining to a 48-hour notice that appears to have been filed late. This notice was the subject of a Form 99 - Miscellaneous Electronic Submission (FEC-1189962) that we filed at your suggestion on October 31, 2017. This submission is on the public record and available on the Commission's website, but we have copied its content below for reference:

"I am writing regarding Freedom Partners Chamber of Commerce filing FEC-1189924. We experienced technical issues from October 27th - October 28th which prevented us from making a timely submission. We attempted a paper filing but were later informed by your office paper filings are no longer accepted. Per your instructions we are filing this Form 99 - Miscellaneous Electronic Submission to document our efforts to comply with the 48-hour reporting requirements promulgated by the FEC."

The circumstances surrounding the 48-hour notice have not changed since we submitted this form. Freedom Partners made disbursements for independent expenditures on October 26 and 27, 2017. We tried to file the relevant 48-hour notice the evening of Friday, October 27 - a day before the October 28 deadline - but encountered technical difficulties that prevented us from officially submitting. We then called the FECFile Helpdesk the morning of October 28, but because it was a Saturday, we were only able to leave a voicemail. Realizing that we would not be able to reach the helpdesk until Monday, we also overnighted a paper copy of the notice on Saturday in an attempt to still meet the filing deadline. On Monday, October 30, we spoke with the helpdesk to resolve our technical issue and also called you to explain the situation and seek advice on how to proceed compliantly. On that call, you notified us that the paper filing was not sufficient and advised that we explain the situation for the record in a Form 99 submission. Accordingly, we electronically filed the 48-hour notice on October 30 and filed the Form 99 on October 31.

Sincerely,

Robert Heaton  
Executive Vice President and Chief Financial Officer  
Freedom Partners Chamber of Commerce  
C90016692