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Kaitlin Seufert
Federal Election Commission
Washington, D.C. 20463

RE: Request for Additional Information- 48-Hour Notification Report, Filed 07/14/2015

Dear Ms. Seufert,

The purpose of this submission is to respond to your letter of August 11, 2015 regarding the Committee's 48-Hour Notification Report, Filed 07/14/2015.

The reported Independent Expenditure was for a national digital media buy that was not targeted to any specific state, but was disseminated among all the states. Applying the approach outlined in the Commission's Western Representation AO (2011-28), which in relevant part instructs committees to divide the costs of nontargeted national digital media buys equally across the number of states with primary elections remaining in the cycle, would drop the expenditure below the reporting threshold in every state. Under this approach, the Committee would not have reported this expenditure until January 2016, when it next files a Form 3X. Instead, the Committee reported it within 48 hours of dissemination via Schedule E, and now desires to leave the report on the public record as filed to further the public's interest in disclosure.

Sincerely,
Keith Gilkes
Treasurer
