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March 8, 2013

Kaitlin Eger  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re:Google Inc. NetPAC (C00428623) September Monthly Report

Dear Ms. Eger:

I write in response to your letter dated February 6, 2013, regarding contributions disclosed by Google Inc. NetPAC ('NetPAC') on its 2012 September Monthly Report.

Your letter suggests that NetPAC is affiliated with Motorola Solutions, Inc. Political Action Committee ('MOTPAC'). That is incorrect. NetPAC became affiliated with Motorola Mobility, Inc. PAC ('MMI PAC') in May 2012. At the time that NetPAC and MMI PAC affiliated, MMI PAC was not affiliated with MOTPAC; MMI PAC and MOTPAC disaffiliated on January 7, 2011 and have remained disaffiliated since that time. Because contributions made by MOTPAC subsequent to its disaffiliation with MMI PAC are not attributable to NetPAC or MMI PAC, the August 15, 2012 contribution by NetPAC complied with the per-election limits set forth at 2 U.S.C. 441a(a). See FEC Adv. Op. 1996-42 ('contributions by each SSF to the same candidate after their disaffiliation would only be attributed to the SSF making the contribution.').

I hope that this information resolves your questions about this report. If you require any additional information, please feel free to contact me directly.

Very truly yours,

Kate S. Keane  
Counsel for NetPAC

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