

I am responding to your August 5, 2011 letter about the amended Form 1 that the committee filed electronically on August 1. Please note that this report amends an original Form 1 that was filed non-electronically, so 11 C.F.R. 104.18(f) does not apply to this amendment. Even if that provision did apply, the amended Form 1 in fact includes information on all lines of the form and your letter does not identify any omitted required information. If this is a form letter that is sent whenever an amended Form 1 is filed, then it is confusing, especially because it suggests that there is an omission and requires a response even when the amendment is complete and correct.

Also, the Commission's official instructions for Form 1 are misleading because they do not reflect the requirement of 11 CFR 104.18(f). Instead, the instruction for Line 4 on page 1 says only that an amended Form 1 must complete Lines 1-4 but ""with respect to Lines 5-9 include only the change(s) in information previously submitted."" This instruction makes no distinction between amending an electronic and amending a non-electronic filing of the previous Form 1.

We are also filing a further amended Form 1 in order to correct the previous amendment, but not because of any failure to comply with 11 CFR 104.18(f).
