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RE: April Monthly Report (3/01/2012 - 3/31/2012)

1. The original receipt of 3,442.23 from CWA employers occurred during February 2012 and was deposited into the Committee's account because it appeared to be a transmittal of payroll-deducted contributions to the Committee by CWA members employed by the employers.

The Committee included this figure in its March 2012 Monthly report in its Line 11(a)(ii) total for unitemized contributions. During March, the Committee ascertained that this sum in fact comprised of payroll-deducted dues paid by CWA members to CWA. Accordingly, during March, the Committee transferred the funds to CWA. These were recorded on Line 29.

These same kinds of accounting errors occasionally occur due to the volume of employers of CWA members that administer payroll deductions of both CWA dues and Committee contributions that are authorized and paid by the same CWA members.

The Committee has previously handled these kinds of errors in the same manners as described above, without objection from the Reports Analysis Division. We also believe that similar transactions were reviewed during the Commission's audit of the Committee for the 2001-02 period, and we were not requested to handle them any differently in our Form 3X reporting.

Your letter does not advise as to how the April Monthly 2012 report should be amended, and it seems to us that any further amendment here is unnecessary in light of the nature of the errors, the Committee's rectifications of them, the Committee's disclosures on the applicable report, and this exchange of correspondence. Please apprise us, however, how the circumstance described above should be handled, including whether we should record the reversal of each kind of mistaken receipt on Line 21(b), 28(a) or 29, or in some other manner. In no circumstance do we believe it would be proper to show the employer as a ""contributor"" to CWA.

2. The vendor invoice for the work was paid on March 8, and the independent expenditure was disseminated on March 16. The Committee reported the independent expenditure on the day it was disseminated. Although the Committee mistakenly reported the day on which the invoice was paid, the date of dissemination, pursuant to the FEC's October 2011 Interpretive Rule, was March 16. The report has been amended to reflect the proper date.