

Jodi Winship
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Reports Analysis Division

Re: June Monthly Report (5/1/08 - 5/31/08)

1. CWA-COPE PCC for years has utilized a procedure that fully complies with the Commission's "best efforts" requirements, and it is following that procedure in connection with this report. That procedure is described in letters to your office dated 6/9/06 and 12/17/03, which are found on CWA-COPE PCC segment of the Commission's website as "miscellaneous reports" to the Commission by CWA-COPE PCC. Your office has never questioned the substance of that procedure, and it seems unnecessary to ask CWA-COPE PCC to explain it again.

2. CWA-COPE PCC is trying to ascertain whether or not there is a different or more precise occupational designation for the member-contributors listed as "COMM. WORKERS OF AMER./CWA STAFF" and "COMM. WORKERS OF AMER./STATE WORKERS OF AMER." do so because these descriptions are as generic as a description of "employee" would be, although your letter fails to explain why these member-contributors are "inadequately identified" as such. However, the other occupations questioned in your letter are the job titles of the member-contributors at issue, your letter fails to explain why they are "inadequately identified" as such, and the Commission provides no standards as to specificity of occupational designations that would guide a committee in this matter. There are virtually countless occupations and job titles within the American work force, and the Commission should either provide guidelines about them or act very sparingly in seeking clarification of them, especially with respect to the identification of rank-and-file union members.

3. We acknowledge that there are some inconsistencies in this report as your letter describes. They are due to an upgrading of the CWA-COPE PCC reporting software from a desktop version of NGP's "Campaign Office" software to an on-line version of that product. CWA-COPE PCC experienced technical problems with this transition, which have been partially corrected. When the corrections are completed, CWA-COPE PCC will be able to file an amended report that reflects them, and it will do so at that time.

4. This contribution was inadvertently misreported as attributed to the primary election. It was correctly designated to the LaTourette for Congress Committee, which correctly attributed it to the general election. When CWA-COPE PCC files an amended report, it will correct this designation.

5. The check for \$3,000 to Woolsey for Congress has never been deposited, and on August 22 CWA-COPE PCC voided the check, as it will report on its September 20 report. Accordingly, CWA-COPE PCC did not exceed the applicable contribution limit and need not seek a refund of any contribution.

Thank you for your consideration.

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