

April 13, 2007

Ms. Jodi Winship
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: All America PAC
FEC ID No. C00344788

Dear Ms. Winship:

This is in response to your letter dated March 14, 2007 concerning the Amended 30 Day Post-General Report (10/19/06-11/27/06), received 1/31/07, of the All America PAC (the "Committee").

You ask about expenditures for "Catering," "Catering and Facility Rental" and "Fundraising Consulting Services." These expenditures were for the Committee's own operation and were not made on behalf of any specifically identified federal candidate.

You also asked about an expenditure for "Direct Mail" and "Communications Consulting and Expenses." These expenses were made to conduct the committee's own activities and did not contain express advocacy.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Robert Bauer
Counsel to All America PAC
