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NAME OF COMMITTEE (In Full)  
 COMMUNICATIONS WORKERS OF AMERICA-COPE POLITICAL  
 CONTRIBUTIONS COMMITTEE

FEC IDENTIFICATION NUMBER  
 C00002089

Mailing Address 501 Third Street, NW

City	State	ZIP Code
Washington	DC	20001

Michael Adamsky  
 Campaign Finance Analyst  
 Reports Analysis Division

Re: Amended Year-End Report (11/27/2018 ? 12/31/2018)

Dear Mr. Adamsky:

We are responding to your two questions regarding this report.

1. On November 28, 2017, you sent the Committee an RFAI asking for clarification of the Committee's purpose description "CWA-COPE Fundraising Awards" on Line 21(b) with respect to payments to vendor William Kendrick Company. In our response submitted on the following December 12, we explained:

CWA COPE PCC has reported "CWA-COPE Fundraising Awards" on Line 21(b) for over 11 years, to report the cost of incentive items given to CWA affiliates that met certain fundraising targets for the Committee; and the same payee has been so listed for many years. The Reports Analysis Division has never raised a question or objection to this description before. This description does not appear on either the Commission's list of inadequate purposes or adequate purposes for disbursements, and it is more accurate than Fundraising Supplies, which is the most accurate adequate purpose. In light of these facts, it does not appear worthwhile to amend the August Monthly Report to use a less informative description or to guess what other description would be acceptable. Please provide the Committee with an explanation as to why this longstanding purpose description is now inadequate and what description would be adequate.

We have not heard further from your office about that entry. You now ask for clarification about the similar purpose description, PAC Fundraising Incentive Items, for a payment to vendor K & R Industries. Similarly to the subject of our RFAI exchange in 2017, the Committee has repeatedly provided this purpose description for payments to K & R Industries in reports to the Commission since 2007, and the reports Analysis Division has never questioned our doing so.

Please be advised that this description means exactly the same thing as CWA-COPE Fundraising Awards and, again, there is nothing on the adequate purposes list that is more accurate. Please advise us as to why PAC Fundraising Incentive Items is inadequate and what description would be adequate; and it would also be helpful to know why on both counts, as well as why after all these years these questions are being raised when there is no intervening change in the law as far as we are aware.

2. All or virtually all of the missing contributor information concerns the occupations of the listed contributing members of the Committee's connected organization, the Communications Workers of America. This report reflected a relative increase in the number of individuals for which there was this missing information because, as is usual, the last month of the calendar year produces a relatively far higher number of itemized contributors than do previous months: this report itemized approximately 200 more contributors than did the previous, Post-General Report. We have been seeking the missing information concerning individual contributors that are reflected on the report by the same methods that the Committee has described in previous responses to RFAs, and whatever information we secure we will disclose in memo entries on Schedule A.

Sincerely,  
 Sara Steffens, Treasurer