

MISCELLANEOUS TEXT (FEC Form 99)

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RE: September Monthly Report (08/01/2011-08/31/2011)

We are in the process of securing the missing information concerning some of the individual contributors to the CWA-COPE Political Contributions Committee (CWA-COPE PCC).

All contributors who are listed with missing information are members of CWA-COPE PCC's sponsor, the Communications Workers of America (CWA), and make their contributions through payroll deduction systems administered by their employers, located throughout the country, pursuant to individual payroll deduction authorizations that have been executed at various times, in compliance with 2 U.S.C. 432(i) and 11 C.F.R. 104.7(b)(1). Specifically, the authorization form includes spaces for a contributor to provide his or her name, mailing address, occupation and name of employer, and explains in a clear and conspicuous manner that federal law requires us to use our best efforts to collect and report that information. Accordingly, when a particular contribution is remitted through this payroll deduction system, it is usually not in response to a new solicitation that requests the contributor's name, address, occupation and employer.

CWA and CWA-COPE PCC use best efforts to obtain missing information about contributors. If address, occupation or employer information is missing, we first search the CWA membership database to determine whether the information is contained there. If so, that information is added to the CWA-COPE PCC contributor database. If we do not find the missing information from the membership database, we contact the member's local union requesting that it determine and provide the missing information. One of these two methods has virtually always produced the missing information. If neither does so, however, we will send a letter directly to the member requesting the missing occupation and employer information. That letter will satisfy 11 C.F.R. 104.7(b)(2) in that it will not address any other subject or include an additional solicitation, and it will state that federal law requires that we use best efforts to collect and report the information requested. The member will also be provided with a stamped, self-addressed postcard or envelope for his or her response.

If CWA-COPE PCC receives a contribution by means other than payroll deduction and any of the required contributor information is missing, then we will follow the procedure described above.

In accordance with 11 CF.R. 104.7(b)(4), CWA-COPE PCC will file with its next regularly scheduled report an amended Schedule A listing all contributions for which additional information was received.

We believe this process meets the Commission's ""best efforts"" requirements.

Thank you for your attention and consideration.
