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October 1, 2015

Kaitlyn Seufert  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Re: Security Is Strength PAC  
ID No. C00573733  
Mid-Year Report (3/3/15 - 6/30/15)

Dear Ms. Seufert:

This letter responds to your letter dated September 17, 2015, requesting additional information from Security Is Strength PAC (the 'Committee.')

Regarding the first item in your letter, the Committee filed an amended Mid-Year Report today, to clarify the 'consulting fees' description on Schedule B, Line 21(b). If you have any additional questions regarding this item, please let me know.

Regarding the second item in your letter, which addresses the 48-hour reporting requirement in 11 CFR 104.4(b), please note that the Committee did not overlook filing a 48-hour report for the independent expenditure disclosed on Schedule E of its Mid-Year report. Rather, the Committee's understanding was that 48-hour reports were only required to be filed in the applicable election year to which an independent expenditure relates, which in this case was 2016. As explained below, the Committee came to this understanding of 11 CFR 104.4 based on the advice of counsel and upon the advice of three different employees of the FEC's Information Division, including a supervisor.

On May 1, 2015, a representative of the Committee placed a call to the FEC's Information Division and spoke with a specialist. The specialist immediately and unequivocally confirmed that the 'during the calendar year' language in 11 CFR 104.4 meant that the committee was only required to file 48-hour reports if it made independent expenditures in the calendar year of the applicable election (i.e., 2016). The specialist went on to note that even though some committees were filing 48-hour reports in 2015 for elections that will not be held until 2016, these committees were doing so gratuitously and were not required to file the reports.

On June 4, 2015, a representative of the Committee again placed a call to the FEC's Information Division and spoke with a different specialist. The specialist confirmed that under 11 CFR 104.4, no 48-hour reporting of independent expenditures related to 2016 elections was required in calendar year 2015. The specialist indicated that she wanted to confirm the accuracy of her advice with her supervisor, and placed the Committee's representative on hold. When she resumed the call, she informed the Committee's representative that the supervisor had confirmed that her advice was correct.

Both of these calls were documented by the Committee's representative in notes prepared during and immediately after the call.

It is my understanding that there is no need at this point for the committee to file a 48-hour report for the relevant independent expenditure, since it has already been disclosed on Schedule E of the Mid-Year report. If this is incorrect, please let me know at your earliest opportunity.

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