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November 16, 2012

Ben Holly
Senior Campaign Finance Analyst
Reports Analyst Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: C90004185

Dear Mr. Holly:

The purpose of this letter is to respond to your letter dated October 12, 2012, regarding the April Quarterly Report (1/1/12 ? 3/31/12) of NARAL Pro-Choice America, identification number C900041485.

Your letter asks about expenditures on 24- or 48-hour reports that do not appear on Schedule 5-E of this report. We have compared your attachments to our records and, for every entry on the 24- or 48-hour reports (except where noted below), there is a corresponding entry on Schedule 5-E, and vice versa. The expenditure amounts differ, due to the nature of the 24- or 48-hour reports as estimates; Schedule 5-E reflects the final and accurate expenditure amounts. The two expenditures on 3/6/12 that you identify were reported on both the a 24-hour report and the quarterly Schedule 5-E; however, the 24-hour report mistakenly identified the payee. NARAL Pro-Choice America will amend this report.

Your letter also asks about expenditures that appear on Schedule 5-E of this report but not on NARAL Pro-Choice America's 24- or 48-hour reports. All of these expenditures relate to presidential primary elections, and none were communications targeting a specific state election. Under Advisory Opinion 2011-28, when calculating when a 24- or 48-hour report is triggered for communications that do not reference or target a specific presidential primary election, one divides the cost "by the number of upcoming primary elections" to determine when the 24- and 48-hour reporting thresholds are crossed. Given the number of upcoming primary elections when these expenditures were made, NARAL Pro-Choice America believes that 24- or 48-hour reports would not have been required at all for these expenditures.

Finally, your letter inquires about the reporting of contributors on Form 5. The Commission's regulations require the disclosure of contributors when a "contribution was made for the purpose of furthering the reported independent expenditure." 11 C.F.R. ? 109.10(e)(1)(vi). NARAL Pro-Choice America had no such contributors to report; as a matter of policy, it does not accept contributions earmarked for a specific political purpose.

If you need any further information, please do not hesitate to contact me.

Very truly yours,

Ezra W. Reese
Counsel to NARAL Pro-Choice America
