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May 4, 2007

Via electronic filing

Ms. Rosa G. Lewis  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036  
Amended 2006 30 Day Post-General Report (10/19/06 - 11/27/06), received 2/16/07

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated April 4, 2007, regarding the 2006 Amended 30 Day Post-General Report filed by SEIU COPE on 2/16/07. In that letter you raise six (6) questions regarding certain expenditures reported by SEIU COPE on Schedules B and E of its Report and on the 24 and 48 hour notices that SEIU COPE filed with the Commission disclosing certain independent expenditures. I will respond to your questions in the order they were asked.

Question 1.

The 10/31/2006 independent expenditure of \$1,265.40 paid to the SEIU Communications Center Inc. for phone bank services on behalf of congressional candidate Phil Hare which began on 10/12/2006.-- The amount of this expenditure is below the reporting threshold for 48 hour notices. SEIU COPE will amend its Pre-General Report to reflect the debt to SEIU Communications Center Inc. for these phone bank services and its Post-General Report to reflect the payment of this debt.

The 11/3/2006 independent expenditure of \$701.90 paid to the Pennsylvania State Council for canvass material on behalf of congressional candidate Joseph Sestak -- This independent expenditure was included within the expenditures reported on SEIU COPE s 11/4/2006 24 hour notice but may have been confusing because 3 actual expenditure items in the Report equate to the 2 items included on the 24 hour notice. SEIU COPE will amend the Post-General Report to include a note to clarify this.

Question 2.

SEIU Local 4 -- The independent expenditure in the amount of \$3,045 dated 11/3/06 reported as payable to SEIU Local 4 for canvass workers supporting congressional candidate Jason Altmire, on a 24 hour notice filed on 11/4/2006, incorrectly identified the vendor. The canvass workers were provided by the Pennsylvania State Council, SEIU and the payment for these services was included in the 11/27/06 payment to the Pennsylvania State Council which was reported on SEIU COPE s Post-General Report.

Pennsylvania State Council, SEIU -- The independent expenditure in the amount of \$640 paid to the Pennsylvania State Council for literature supporting congressional candidate Jason Altmire, reported on the 11/4/2006 24 hour notice, was part of the 11/27/2006 payment to the Pennsylvania State Council reported on SEIU COPE s Post-General Report.

SEIU (General Fund) -- Payments to the SEIU (General Fund) for the independent expenditures disclosed in the 11/4/2006 24 hour notices are reflected in Schedule E of the SEIU COPE Amended 30 Day Post-General Report as having been made on 11/4/2006.

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**ETEXT ATTACHMENT**

Zata 3 -- This vendor provided services as a subcontractor for SEIU Communications Center, which paid Zata3 \$5,896.76 and 14,323.73 for the phone bank services reported by SEIU COPE on its 11/2/2006 and 11/3/2006 24 hour notices. While the 24 hour notice was filed assuming that SEIU COPE would pay Zata3 directly, the actual expenditure by SEIU COPE was paid to SEIU Communications Center instead. SEIU COPE will amend its Post-General Report to reflect this debt to SEIU Communications Center and clarify its relationship to the 24 hour notice items.

Marek Group - Payment for the expenditure of \$747.50 was made to the wrong vendor and the correct payment was not made to the Marek Group until 2007. SEIU COPE will amend its Post-General Report to reflect the existence of this debt to the Marek Group.

Andres Ramierz - In its 24 hour notice, SEIU COPE estimated two payments of \$20,000 and \$6,280 to be made to Andres Ramierz for canvass personnel and expenses in the independent expenditure on behalf of congressional candidate Tessa M. Hafen. However, according to SEIU COPE s records, only \$20,000 in expenditures were actually incurred and paid. No payment of \$6,280 was made to Mr. Ramierz, and thus correctly is not included in any Form 3 report.

Question 3.

On 11/3/2006 SEIU COPE filed a 24 hour notice for an independent expenditure in the amount of \$14,448.08 for canvass materials in support of the congressional candidate Steve Kegan. The payment was made to SEIU Local 150 for the printing of literature which also included non-federal candidates. The amount reported on the 24 hour notice was the estimated federal candidate share of the literature. However, SEIU COPE subsequently paid SEIU Local 150 for the entire cost of the canvass literature and that payment of \$28, 996.17 is the amount reported on SEIU COPE s Post-General Report. SEIU COPE will amend Schedule E and Line 24 to reflect the amount of the independent expenditure on behalf of the federal candidate and amend Schedule B and line 29 for the balance as an other disbursement related to a non-federal election.

Correlation issues raised by your question can, with the exception noted above and the Pennsylvania State Council items discussed under question 2, fall into three categories: situations where the date of the distribution or dissemination of the independent expenditure reported on the 24 hour notice differs from the date of the payment for the independent expenditure reported on the Form 3; situations where the estimated cost of the independent expenditure reported on the 24 hour notice is more than the amount which was ultimately paid and reported on the Form 3; and situations where the estimated cost of the independent expenditure reported on the 24 hour notice is less than the costs actually paid and reported on the Form 3. In each of these situations SEIU COPE will amend its Form 3 report to indicate the 24 hour notices to which the reported payments for independent expenditures relate.

Question 4.

Expenses for independent expenditure activity on behalf of these candidates were incurred prior to and/or on Election Day and were paid in the same reporting period so that no memo entries were required.

Question 5.

The expenditure described as "catering for event" was for a dinner for individuals who worked on SEIU COPE s canvass operation. The expenditure was not made on behalf of a specifically identified federal candidate.

Question 6.

SEIU COPE reported twenty (20) expenditures on line 21(b) of Schedule B of its Report for public communications and voter drive activity. According to our records, none of these expenditures expressly advocated the election or defeat of any clearly identified federal candidate and were therefore were properly reported on line 21(b).

If you have any further questions regarding this matter, please feel free to contact me at 202-730-7465.

**ETEXT ATTACHMENT**

Very truly yours,

John J. Sullivan  
Associate General Counsel  
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE  
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