

August 26, 2009

Jodi Winship
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: March Monthly Report (02/01/09-02/28/09)

Dear Ms. Winship:

1. This disbursement was not for a candidate appearance.
2. The discrepancy, in some Schedule A entries, between the total amounts received and the listed frequency of the payroll deductions arises from a single employer of 388 CWA member-contributors, Verizon ? Yellow Pages (?Verizon?), which since last year has been involved in a labor dispute with CWA concerning matters unrelated to CWA-COPE PCC, and has routinely failed to include an itemization of member-contributors to CWA-COPE PCC with its remittances of payroll-deducted contributions by them. Verizon also has remitted payroll-deducted membership dues and forwarded them to CWA-COPE PCC. CWA-COPE PCC undertakes a receipts reconciliation process when it receives any payroll-deducted remittance, and Verizon?s lack of cooperation, untimely provision of information and erroneous remittances have presented a considerable challenge to our maintenance of timely and accurate reports to the Commission.

CWA-COPE PCC has routinely and timely reported, as unitemized contributions, remittances from Verizon that lacked back-up contributor information once it was ascertained that the remittances were for CWA-COPE PCC. As a consequence of Verizon?s recalcitrant conduct, by the time Verizon sends accurate contributor information the reporting period has passed when the receipts arrived. And, by the same token, due to Verizon?s lack of cooperation and unreliability, we cannot confidently record when particular attributed amounts actually were received. Accordingly, as soon as we are aware that a particular contributor should be itemized, the total amount is reported on Schedule A. This does not affect the monthly or aggregate Line 11 totals, because those always correspond to the total actual receipts of CWA-COPE PCC during a reporting period.

We continue to try to rectify this situation with this recalcitrant employer. We welcome any suggestions from your office regarding how to handle ongoing reporting under these unusual circumstances.
