



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

MEMORANDUM

TO: THE COMMISSION  
STAFF DIRECTOR  
GENERAL COUNSEL  
FEC PRESS OFFICE  
✓FEC PUBLIC RECORDS

From: Mary W. Dove *MWD*  
Acting Secretary of the Commission

DATE: February 16, 2000

SUBJECT: COMMENT: PROPOSED AO 1999-39

Transmitted herewith is a timely submitted comment by James Sivesind, Esquire, on behalf of WellPoint Health Networks Political Action Committee.

Proposed Advisory Opinion 1999-39 is on the agenda for Thursday, February 17, 2000

Attachment:

1 page

ES-04-107-1773

**REED & DAVIDSON**

ATTORNEYS AT LAW

520 SOUTH GRAND AVENUE

SUITE 700

LOS ANGELES CALIFORNIA 90071-2645

TELEPHONE (213) 624-8200

FACSIMILE (213) 633-1892

WWW.POLITICALLAW.COM

DANA W REED  
GARY DAVIDSON  
JAMES A SIVESIND  
JEFFREY E LANGAN  
RONCI J WALSH  
IRA D GLASKY  
FLORA S YIN  
  
OF COUNSEL  
BRADLEY W HERTZ

**OTHER OFFICES**

GRANDE POINTE  
1714 641-6888  
  
SACRAMENTO  
18151 447-1888

February 15, 2000

Mr. Jonathan Levin  
Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

VIA FACSIMILE  
ORIGINAL BY U.S. MAIL

Re: WellPoint Health Networks "WELLPAC"  
Draft Advisory Opinion 1999-39

Dear Mr. Levin.

This letter constitutes our written comments with respect to the February 10, 2000 Draft Advisory Opinion 1999-39. Specifically, please note the following three factual corrections.

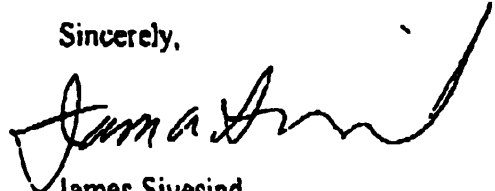
First, line 16 of page three of the draft indicates that WellPoint/UNICARE has offices in thirteen states and the District of Columbia. Please note that WellPoint/UNICARE operates offices in twelve states and the District of Columbia.

Second, line 24 of page four of the draft opinion indicates that Blue Cross Blue Shield Association's board of directors consists of 56 members. Please note that the current number of BCBSA board members is 55.

Finally, line 20 of page six of the draft indicates that the California Healthcare Foundation ("CHF") purchased 80 percent of WellPoint's stock from Blue Cross of California ("BCC"). Please note, as indicated in our January 21, 2000 letter, that this stock was transferred to CHF by BCC, and therefore a more accurate word for this line would be "acquired."

Thank you for the opportunity to comment on the draft opinion

Sincerely,



James Sivesind

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