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June 22, 2012

Krista J. Roche
Assistant Director
Alternative Dispute Resolution Office
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: ADR 615

Dear Ms. Roche:

I write on behalf of my client, the National Committee to Preserve Social Security & Medicare PAC (the "PAC"), in connection with the above matter.

This matter arose from a payment by the National Committee to Preserve Social Security and Medicare (the "National Committee"), the PAC's connected organization, to the PAC of \$107,923.26 to pay for certain PAC administrative expenses. Only a certain portion of that reimbursement had originally been paid in the thirty-day period prior to the reimbursement, and so a portion of the payment violated the Commission's rule at 11 C.F.R. § 114.5(b)(3). This was an inadvertent error; staff of the National Committee and its PAC were unaware of the thirty-day restriction.

As soon as a representative from the Commission's Reports Analysis Division notified the PAC of this error, the PAC refunded the entire amount to the National Committee. The PAC notified the Commission of these actions in public filings on June 3, June 15, and August 11, 2011.

This was a one-time, isolated error that will not repeat. The National Committee and its PAC take compliance with the Federal Election Campaign Act and the Commission's regulations seriously, assign compliance a high priority, and devote considerable time and expense to helping ensure the PAC is administered lawfully, and fully and accurately discloses its activities. (Note that the National Committee's previous – and only – enforcement matter before this one, ADR 186, was self-reported to the Commission.) The PAC administrator, who has served in that role for nine years, attends Commission seminars and roundtables on a regular basis at least once

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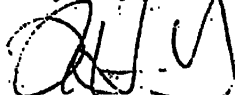
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per federal election cycle. The National Committee has a relationship with our firm as outside counsel, to whom the PAC administrator turns whenever he has questions about the Act or its requirements. And the National Committee, which hires an outside auditor to review its records each year, requires this auditor to review certain of its PAC records as well as part of the annual audit.

Since this incident, the PAC has taken even further steps to strengthen its compliance practices. The National Committee has instructed its PAC treasurer to attend seminars and roundtables at least once per cycle, so there will be a second staff member attending them in addition to the PAC administrator. And the National Committee and the PAC have implemented a policy whereby major decisions by the National Committee's Board of Directors on PAC matters may not be implemented without prior notification and review by the PAC treasurer and administrator.

We hope you find this information helpful. We look forward to working with you to resolve this matter.

Very truly yours,



Rebecca H. Gordon

Counsel to the National Committee to Preserve Social Security & Medicare PAC

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