

February 18, 1991

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

Dear Mr. Gibson:

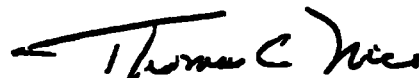
We are requesting an advisory opinion related to the reproduction of the Form FEC 3X page 1 and 2. Pursuant to 11 CFR 104.2(c) "A committee may reproduce FEC forms for its own use provided they are not reduced in size." In addition, 11 CFR 104.2(d) states that "With prior approval of the Commission a committee may use, for reporting purposes, computer produced schedules of itemized receipts and disbursements provided that they are reduced to the size of FEC forms. The committee shall submit a sample of the proposed format with its request for approval."

We are submitting for your approval a computer generated substitute form FEC 3X page 1 and 2. The form is identical to the FEC 3X forms except for font size. The substitute form will result in a report that ties directly to computer produced schedules of itemized receipts and disbursements.

In advisory opinion 1982-7 the Commission interpreted Section 104.2(c) "to mean a photocopy or an otherwise accurate and exact format which would be uncompromisingly legible and would lend itself to a high degree of clarity in microfilming and indexing for public disclosures purposes." After examining the substitute form, you will notice that our proposed form meets these standards.

If you have any questions or if discrepancies arise on the form please contact me at (202) 822-4220.

Very truly yours,



Thomas C. Nice

AAS:TCN
PCN

Enclosures

**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X**

(REVISED 1/1991)

NAME OF COMMITTEE	REPORT COVERING PERIOD	
	FROM	TO
	COLUMN A TOTAL THIS PERIOD	COLUMN B CALENDAR YEAR
I Receipts		
11 Contributions (other than loans) From		
a Individual/Persons Other Than Political Committees		
i Itemized (use Schedule A)		
ii Unitemized		
iii Total . . . (add i and ii)		
b Political Party Committees		
c Other Political Committees (such as PACs)		
d Total Contributions (add a iii, b and c)		
12 Transfers From Affiliated/Other Party Committees		
13 All Loans Received		
14 Loan Repayments Received		
15 Offsets To Operating Expenditures (Refunds, Rebates, etc)		
16 Refunds of Contributions Made to Federal Candidates and other Political Committees		
17 Other Federal Receipts (Dividends, Interest, etc)		
18 Transfers from Nonfederal Account for Joint Activity		
19 Total Receipts . (add 11d, 12, 13, 14, 15, 16, 17, and 18)		
20 Total Federal Receipts (subtract line 18 from line 19)		
II Disbursements		
21 Operating Expenditures		
a Shared Federal/Non-Federal Activity (from Schedule HH4)		
i Federal Share		
ii Non-Federal Share		
b Other Federal Operating Expenditures		
c Total Operating Expenditures (Add a i, a ii, and b)		
22 Transfers to Affiliated/Other Party Committees		
23 Contributions to Federal Candidates/Committees and Other Political Committees		
24 Independent Expenditures (use Schedule E)		
25 Coordinated Expenditures Made by Party Committees(2 USC 441a(d))(use Schedule F)		
26 Loan Repayments Made		
27 Loans Made .		
Refunds of Contributions To		
a Individuals/Persons Other Than Political Committees		
b Political Party Committees		
c Other Political Committees (such as PACs)		
d Total Contributions Refunds (add a, b, and c)		
29 Other Disbursements		
30 Total Disbursements .. (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29)		
31 Total Federal Disbursements . (subtract line 21 a ii from line 30)		
III. Net Contributions/Operating Expenditures		
32 Total Contributions (other than loans)(from line 11d)		
33 Total Contribution Refunds (from line 28d)		
34 Net Contributions (other than loans)(subtract line 33 from 32)		
35 Total Federal Operating Expenditures . (add 21 a i and 21 b)		
36 Offsets to Operating Expenditures (from line 15)		
37 Net Operating Expenditures (subtract line 36 from 35)		

**Coopers
& Lybrand**

certified public accountants

1800 M Street NW
Washington D C 20036

in principal areas of the world

telephone (202) 822-4000

twx 710 822-0140

cables CoLybrand

March 5, 1992

**John Akins
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463**

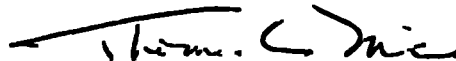
AOR 1992-11

Dear Mr. Akins,

Pursuant to CFR section 112.1(a) I am requesting an advisory opinion concerning the application of CFR section 104.2(c). My original request signed and dated February 18, 1991, copy enclosed, was filed in error with John Gibson.

Please forward this request to The Office of General Council for review. If you have any questions please contact me at 202-822-4220.

Very truly yours,



Thomas C. Nice

Enclosures

TCN/PCN

cc: Brady Litchfield - Office of General Council

92 MAR -6 PM 5:50

01 11:11 AM '92
FEDERAL ELECTION COMMISSION