



Science Applications International Corporation  
An Employee-Owned Company

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COMMISSION  
OFFICE OF GENERAL  
COUNSEL

MAR 9 2 56 PM '95

March 9, 1995

**BY FACSIMILE**

Mr. Lawrence M. Noble  
General Counsel  
The Federal Election Commission  
Washington, D.C. 20463

Supplement To  
AOR 1994-36

Dear Mr. Noble:

Re: SAIC Request for Advisory Opinion of 11-17-94

SAIC is submitting two clarification's to our comments on the draft advisory opinion prepared by the Commission in response to SAIC's request of 11-17-94. Our original comments were sent to the Commission on February 28, 1995.

On p. 3, lines 25, 26 of the Commission's opinion, we originally suggested that the phrase "and may put restrictions on the sale" be deleted. Upon further research, we withdraw this suggestion as there could be restrictions on transfer and on sales outside the quarterly Bull Inc. trades on stock transferred even if SAIC does not exercise its right of first refusal.

With respect to Attachment A to our comments, we confirm that our Profit Sharing Plan was amended effective 1-1-95 to provide for a one-time in-service withdrawal on the same terms as those incorporated into our ESOP at the same time.

We hope this information is helpful. Please call us with any questions.

Sincerely,

Susan M. Frank  
Corporate Counsel

cc. Ward Reed

1710 Goodridge Drive, P.O. Box 1303, McLean, Virginia 22102 (703) 821-4300

Other SAIC Offices: Albuquerque, Colorado Springs, Dayton, Falls Church, Hanoverville, Las Vegas, Los Altos, Los Angeles, McLean, Oak Ridge, Orlando, San Diego, Seattle, Tucson