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November 30, 1995

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Request for An Advisory Opinion
On Behalf Of Continental Airlines

Dear Mr. Noble:

I previously responded in writing to several questions from your office. Our correspondence must have passed in the mail. A review of your letter of November 8 reveals a few questions which were not addressed in my initial letter, and which are answered below.

Question:

- (1) Explain why a request for re-examination of the affiliation status is being sought at this time and was not sought earlier.

Answer:

- (1) It was merely an oversight on our part.

Question:

- (2) Explain whether the option of unlimited transfers of funds from Eastern's separate segregated fund to Continental's separate segregated fund was ever considered and with what results.

Supplements To
AOR 1995-40

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Answer:

- (2) This option was and has never been considered by either PAC. As far as Continental is concerned, the two PACs were and have always remained separate.

Question:

- (3) Describe any obligations of Eastern, such as, for example, payments under Eastern's pension or retirement programs that Continental has guaranteed or is otherwise liable for payment.

Answer:

- (3) Continental has not guaranteed any of Eastern's pension or retirement programs or any other Eastern obligations. The Pension Benefit Guaranty Corporation, which is the guarantor of certain of Eastern's pensions, asserted a claim against Continental which was settled as part of Continental's plan of reorganization in bankruptcy. All other such claims were similarly resolved as part of Continental's plan of reorganization and Continental is not liable for and has not guaranteed any subsequent obligations of Eastern.

If there is any additional information you need in order to make a determination, please do not hesitate to contact me.

Sincerely,



Barbara E. Wixon