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June 25, 1999

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

Attn: Brad Litchfield

AOR 1999-20

Re: Advisory Opinion Request – EQUIPAC

Dear Commissioners:

This is in response to Mr. Litchfield's request for additional information relative to the above AOR.

First, The Equitable Life Assurance Society of the United States is a separate corporate entity that was established in New York in 1859.

Second, the June 12, 1996 letter from EQUIPAC to the FEC that is referred to in my submission of June 11, 1999 is attached.

Sincerely



Evan Migdail



THE EQUITABLE
POLITICAL
ACTION COMMITTEE

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JUN 24 3 33 PM '96

June 12, 1996

Federal Election Commission
990 E Street, NW
Washington, DC 20463
Attn: Amy Suzanne Reynolds
Report Analyst
Reports Analysis Division

Identification Number: CO0161901

Dear Ms. Reynolds:

As per your conversation with my associate, Tom Tarkowski, the name of our associated company has changed to: The Equitable Companies Incorporated. This letter should serve as notification of this change and change of the PAC name to: Equitable Companies, Inc. Political Action Committee (EQUI-PAC). Our affiliated PAC continues to be: Donaldson, Lufkin & Jenrette Inc. Better Government Fund (FEC ID: COO 1033325).

In addition, I would like to designate Thomas W. Tarkowski to sign all FEC communications in my absence.

If you should have any questions, please feel free to call me at (212)554-4795 or Mr. Tarkowski at (212)554-4720.

Thank you for your attention to this matter.

Sincerely,

Paul J. Flora
Treasurer

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THE EQUITABLE 787 Seventh Avenue, New York, NY 10019

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June 11, 1999

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

Re: Advisory Opinion Request - EQUIPAC

Dear Commissioners:

This advisory opinion request is submitted on behalf of The Equitable Companies, Inc. Political Action Committee ("EQUIPAC"), FEC identification number C006161901. Two issues are submitted for your consideration.

1. Committee Name.

By letter dated June 12, 1996 EQUIPAC advised the Commission that it was changing its name to the "Equitable Companies, Inc. Political Action Committee" in order to reflect a change in the name of the parent company of its connected organization to The Equitable Companies Incorporated (a copy of the letter is attached). Under the current corporate structure, The Equitable Companies Incorporated is the name of a holding company that owns The Equitable Life Assurance Society of the United States, which in turn, owns a controlling share of the Alliance Company.

This AOR is being made in anticipation of an impending name change of the holding company from The Equitable Companies Incorporated to AXA Financial, Inc.

Because the connected organization to EQUIPAC is, in fact, The Equitable Life Assurance Society of the United States, rather than its parent, The Equitable Companies Incorporated, it is EQUIPAC's desire at this time to change its name to "The Equitable Life Assurance Society Political Action Committee," and to continue using the abbreviated name "EQUIPAC." A change of name to reflect the name "AXA Financial, Inc." would not in fact properly reflect the name of the connected organization.

EQUIPAC respectfully requests that the Commission approve the requested change in name.

2. SOLICIATION OF AGENTS.

This second AOR issue concerns whether EQUIPAC may solicit contributions from life insurance agents who represent The Equitable Life Assurance Society of the United States.

By way of background, these agents are paid on a commission basis, are eligible to participate in Equitable's employee benefit programs, and are subject to FICA, but not income tax withholding, by Equitable.

In A0 1980-1, the Commission addressed the question of whether the separate segregated fund of the Farmers Mutual Hail Insurance of Iowa could solicit its agents. The facts disclosed with the AO indicate that the agents were paid on a commission basis and that nothing was withheld by their employer. On these facts, the Commission concluded that the agents could not be solicited.

Given by contrast that Equitable withholds FICA from their agents and that they participate in the company's benefit plans, we respectfully ask the Commission to distinguish A0 1980-1 and conclude that EQUIPAC may solicit contributions from its agents.

Sincerely

A handwritten signature in black ink, appearing to read "Evan Migdail". The signature is stylized with a large, sweeping loop at the end.

Evan Migdail