

Rahn K. Porter  
Vice President -  
Treasurer

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FEDERAL ELECTION  
COMMISSION  
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COUNCIL

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October 28, 1999

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Federal Election Commission  
Attn: Office of General Council  
999 E Street N.W.  
Washington, DC 20463

**MediaOne**  
**Group**

Re: Advisory Opinion Request for MediaOne PAC  
Committee ID# C00280529

AOR 1999-33

I am writing to seek an Advisory Opinion for an isolated incident that we have recently discovered with our political action committee.

By way of background, in January 1998, MediaOne instituted payroll deduction for employees who wished to contribute to the PAC. In previous years, MediaOne PAC and its predecessor, Continental Cablevision PAC collected personal checks from employees who were eligible to participate during an annual solicitation period. Payroll deduction in our opinion made sense as a majority of the company was on a centralized payroll system thereby easing implementation and reporting requirements.

On October 1, 1999 MediaOne PAC discovered that one of our regional payroll offices has been collecting employee payroll deductions on a monthly basis since January 1998 and holding these funds in a general ledger account. This region was not converted to the new centralized payroll system until this fall and operated on a separate, stand alone payroll system. This was detected when this regional office was converted to a centralized payroll system and we received year-to-date PAC contribution information on 20 employees from this region.

These funds were not received by the PAC and subsequently not reported on our monthly FEC reports. The total funds collected and not reported from January 1998-August 1999 amount to \$7,983.00. We would like to deposit the funds in our PAC account and report them appropriately on our monthly FEC reports, since those eligible employees contributing through payroll deduction, pledged their support for the company PAC.

Your assistance with this matter is greatly appreciated. Please send your response to the following:

MediaOne PAC  
Attn: Rahn Porter, Treasurer  
188 Inverness Dr W  
Englewood, CO 80112

Sincerely,



Rahn Porter  
Treasurer, MediaOne PAC

bcc: Lorine Card  
Pat Clifford  
Lynwood Evans

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