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October 21, 2015

Daniel A. Petalas  
Acting General Counsel  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: Supplemental Letter – 21<sup>st</sup> Century Fox

Dear Mr. Petalas:

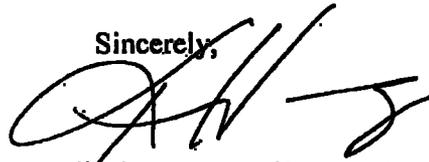
In light of a recent comment to our request for an Advisory Opinion submitted on behalf of 21<sup>st</sup> Century Fox ("Fox"), dated September 11, 2015 (the "AOR"), we are providing this supplemental letter.

In its comment dated September 21, 2015, Make Your Laws asked Fox to provide the number of unique viewers Fox would expect the advertisements which are the subject of the AOR to reach in each U.S. state, district, and territory, as well as information related to calculating those numbers.

However, the standard for determining whether a communication qualifies as an electioneering communication is whether it is capable of being viewed by 50,000 or more people in a State during the relevant time period and not whether it is actually viewed by them. 11 C.F.R. § 100.29(b)(3)(ii). Accordingly, the question presented in our AOR involves resolving the appropriate method to calculate the number of persons capable of viewing an advertisement. The number of viewers Fox actually expects is not relevant. Thus, the above comment should be disregarded.

Please let us know if you have any questions.

Sincerely,



Ki P. Hong  
Charles M. Ricciardelli

cc: Joanna Waldstreicher