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August 4, 2011

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VIA HAND DELIVERY

Christopher Hughey, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

**Re: Matter Under Review 6455 (Penske Truck Leasing Co., L.P. Political
Action Committee et al.)**

Dear Mr. Hughey:

We are in receipt of the supplemental information filed by the Complainant on July 5, 2011, against Penske Truck Leasing Co., L.P. ("Penske JV"); Penske Truck Leasing Co., L.P. Political Action Committee ("Penske PAC"); Penske PAC's Treasurer, Michael A. Duff; and Penske JV's President and CEO, Brian Hard (collectively referred to as "Respondents") in the above-captioned Matter.

The supplemental information adds nothing material to Mr. Vroom's Complaint. Indeed, the supplemental information falls into one or more of the following three categories:

- Inaccurate information;
- Information involving the relationship between Penske JV and the General Electric Company ("GE") when GE owned more than 50% of Penske JV; and/or
- Irrelevant information.

To the extent that the supplemental information is even accurate, the description of events or activities preceding GE's minority status in Penske JV also is simply irrelevant.¹

¹ Note that the deconsolidation continues to have ramifications. For example, Brian Hard no longer holds any position or title (even honorific) with GE or any of its subsidiaries or affiliates.

Christopher Hughey, Esq.

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As a result, Respondents continue to Prely on (1) their April 4, 2011, response in this Matter; (2) Penske JV's, Penske PAC's, and Penske Truck Leasing Corporation's initial advisory opinion request and supplements thereto; as well as (3) FEC Advisory Opinion 2009-18, which confirmed the disaffiliation of Penske PAC and GE's PAC after the deconsolidation of Penske JV from GE.

Sincerely,



Carol A. Laham

D. Mark Renaud

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