



American Pharmaceutical Association—Political Action Committee • 2215 Constitution Avenue, NW • Washington, DC 20037-2985 • (202) 628-4410

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July 14, 1994

N. Bradley Litchfield
Associate General Counsel
Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: AOR 1994-21

Dear Mr. Litchfield:

In accordance with my July 13, 1994 telephone conversation with Jonathan Levin of your staff, the American Pharmaceutical Association-Political Action Committee (APhA-PAC) submits the following as supplemental material to our Advisory Opinion Request (AOR) 1994-21.

The Commission has raised a question regarding APhA-PAC's ability to delete a suggested dollar amount (specifically, \$25) from a dues renewal invoice solicitation, while not being able to delete the solicitation all together from invoices received by APhA's unsolicitable members. As it is stated in the original AOR, the number of unsolicitable members numbers 1,000 out of 30,000. All 30,000 members currently receive the same standard invoice form which includes preprinted information. The blanks are then filled in by a computer program with specific information/dollar amounts relating to the individual receiving the invoice. These blanks relate to the type of member, the official Association journal chosen and method of payment, as well as space for the members name and address, the date, member identification number, etc. The blanks are filled with information retrieved from an individual's member record. Because the 1,000 unsolicitable members pay the same amount in dues and receive the same benefits (except for voting for the highest governing office) as our solicitable members, it is easier, more convenient and most of all, more cost efficient for the Association to use the same invoice form for all 30,000. Obviously, it is easier to change a computer program because it is individual specific than it is to utilize different forms for only a small percentage of out members. A copy of the proposed form is enclosed to help illustrate our position. I have also enclosed copies

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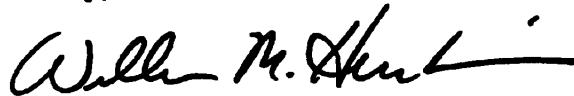
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of the form as it would look for a solicitable member and an unsolicitable member.

I hope this answers the concerns raised by the Commission. If I may be of any further assistance, please do not hesitate to contact me at 202/429-7533.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "William M. Hermelin". The signature is fluid and cursive, with a long horizontal stroke at the end.

William M. Hermelin
Assistant Treasurer, APhA-PAC