

May 8, 2002

Att: Advisory Group on Organizational Guidelines
C/o Office of Public Affairs
U.S. Sentencing Commission
Suite 2-500 South Lobby
One Columbus Circle, N.E.
Washington, D.C. 20002

We are writing in response to your Request for Public Comment regarding the Sentencing Guidelines. As we understand, particular emphasis will be given to the criteria for an effective compliance program.

I am the CEO and General Counsel of LRSolutions, a legal knowledge provider that provides expert legal work to Fortune 1000 corporate counsel and law firms. Our experienced attorneys work with leading experts in each substantive field. We have partnered with Cognitive Arts, a leading e-learning company that provides customized e-learning solutions to Fortune 1000 level companies.

We are developing a unique e-learning compliance solution for corporations to help them comply with the requirements of the Federal Sentencing Guidelines. Our core curriculum consists of several basic areas of emphasis, including Antitrust Law, Sexual Harassment and Discrimination, Insider Trading, and Foreign Corrupt Practices Act, to name only a few.

Our approach employs a "learn by doing" system, in which each employee is engaged in real-life situations, and must navigate through the myriad of legal pitfalls in order to reach a compliant result. As the user weaves through the different scenarios, all the key legal principles are effectively drilled, ensuring that learning actually takes place.

It is our strong belief that effective compliance learning requires the following elements:

- interactivity to ensure that the employee is taking proactive steps throughout the learning process
- Courses designed by leading legal experts in each field, who are able to develop scenarios and examples most relevant to job performance
- Learning architectures and designs that allows employees to drill down core concepts, while "learning by doing" in an engaging, even entertaining fashion
- an online learning system geared for a large, diverse workforce that includes an assessment (i.e. multi-choice, exam, scenarios) that provide

verifiable data displaying that employees not only took the courses, but actually learned the materials.

- the ability to customize each learning solution to the particular needs of each organization
- Use of the above criteria to eventually certify compliance training programs, thus reducing any existing uncertainty and ambiguity.

For simplicity sake, I have not gone into great detail about our program. However, I would be happy to discuss our concepts with you. Please feel free to contact me if you have any questions about our online compliance program or any further assistance regarding the makeup of an effective program.

Sincerely,

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