

May 16, 2002

Advisory Group on Organizational Guidelines  
c/o Office of Public Affairs  
United States Sentencing Commission  
Suite 2-500 South Lobby  
One Columbus Circle, NE  
Washington, D.C. 20002

Re: Federal Sentencing Guidelines

Dear Advisory Group:

I have a proposed modification to the Federal Sentencing Guidelines.

The Guidelines currently provide that the organization have a high-level person in charge of the compliance program. I would take this provision one-step further and require that the senior executive (typically the CEO) be actively engaged in the program.

He would not have to be responsible for the day-to-day administration of the program; but he would have to demonstrate a consistent and substantive involvement in promotion and support of the (ethics) compliance program.

In my corporate experience, the opportunity for misunderstanding about where the company stands in regard to doing the right thing is rare if the CEO is delivering a strong and consistent message about corporate integrity.

This involvement could be demonstrated in a variety of ways:

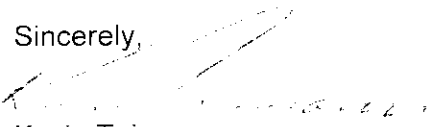
- Regular appearance on the Annual training video,
  - Frequent reference in all employee communications to the importance of the program,
  - Demonstrated behavior, both internally and externally, that sets an example of personal commitment to ethical conduct,
  - Material commitment of corporate resources to the program - consistent with industry standards,
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I am sure there are other opportunities that the CEO could demonstrate his commitment, all of which would support the company's case that it has a credible program to minimize the risk of corporate wrongdoing.

Thank you for the opportunity to contribute to the public comments.

Sincerely,



Kevin Teismann  
Director, Business Practices

KPT:vo (02051497.Ltr)

Cc: Mr. Mike Andrews