

ETHICS OFFICER ASSOCIATION

Dedicated to promoting ethical business practices

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November 6, 2001

United States Sentencing Commission
One Columbus Circle NE
Suite 2-500, South Lobby
Washington, DC 20002-8002
Attention: Michael Courlander, Public Affairs

To Whom It May Concern:

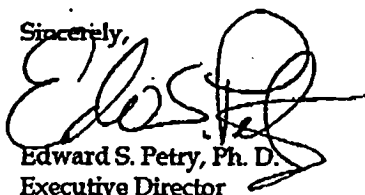
The following is in response to the request for comment on the possible formation of an ad hoc advisory group on the Organizational Sentencing Guidelines.

On this the tenth anniversary of the Organizational Guidelines, it is clear that they have had a major impact in promoting ethical and law-abiding conduct within corporations. One measure of this impact has been the growth of the Ethics Officer Association (EOA). The EOA was founded in 1992 - several months after the guidelines went into effect. It is the peer-to-peer, non-consulting association for managers of ethics and compliance programs. At its founding the EOA had only 12 members. Today, it has over 770 members, including more than one-half of the Fortune 100.

The impact of the Organizational Guidelines can also be seen in the attendance at a series of forums cosponsored by the U.S. Sentencing Commission and the EOA. The forums were designed to discuss the Guidelines, their impact, and suggestions to improve the implementation of corporate programs in response to the Guidelines. They have been held in Atlanta, Boston, Chicago, Columbus, New York, and San Francisco and have drawn over 500 attendees including ethics and compliance officers, senior executives, and representatives from the prosecutorial community.

The EOA has been, and can continue to be, a principal link between the Commission and those with the responsibility to develop and oversee ethics and compliance programs. It can also continue to serve as a forum for the exchange of information and best practices and provide opportunities for discussion among diverse parties. We welcome the opportunity to continue to serve in this capacity, to participate in the ad hoc advisory group on the Organizational Sentencing Guidelines and/or to assist the Commission in other appropriate ways.

Sincerely,



Edward S. Petry, Ph. D.
Executive Director