



**DEFENSE
INDUSTRY
INITIATIVE**

ON BUSINESS ETHICS AND CONDUCT

Richard J. Bednar, DII Coordinator
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW, Suite 1000
Washington, DC 20004-2595
202/624-2619; 202/628-5116 (Fax)
rbednar@crowell.com

October 30, 2001

United States Sentencing Commission
Attn: Public Affairs
One Columbus Circle, NE
Suite 2-5400, South Lobby
Washington, DC 20002-8002

**Re: Request for Comment on Possible Formation of an
Ad Hoc Group on Organizational Sentencing
Guidelines, 66 Fed. Reg. 48306 (Sep 11, 2001)**

Dear Sir/Madam:

On behalf of the Defense Industry Initiative on Business Ethics and Conduct ("DII"), I am submitting comment on the above-referenced matter. The DII, founded in 1986 as a result of the President's Blue Ribbon Commission on Defense Management (the Packard Commission), is a private organization of about 50 defense contractors who have voluntarily joined together to embrace and practice a high level of business ethics and conduct. A listing of the current DII Signatories is enclosed for your information.

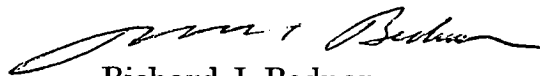
The public announcement of the prospective review of the organizational sentencing guidelines coincides with our own on-going review by our governing body - the Steering Committee - of the principles adopted and practiced over the past 15 years of the DII existence. This review is to assure that those original Principles remain vibrant and appropriate. Even if this review should result in no change, and conclude in the reaffirmation of these original Principles, the review process will have strengthened the commitment of the Signatory companies and will have given a fresh impetus to the faithful practice of those Principles.

The DII has studied the organizational sentencing guidelines over the years, and has noted the harmony of those guidelines with our own Principles and practices. The DII Principles were considered by the Sentencing Commission in its work in developing the organizational sentencing guidelines. We believe the DII would bring an important

United States Sentencing Commission
Attn: Public Affairs
October 30, 2001
Page 2

perspective to the ad hoc Group not available from any other institution. We therefor support the formation of the Group and would welcome the opportunity to serve as a member of it.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Richard J. Bednar", with a stylized flourish at the end.

Richard J. Bednar
DII Coordinator

Enclosure

1854267

**DEFENSE INDUSTRY INITIATIVE
JULY 2001 DII SIGNATORIES**

Advanced Technical Products, Inc. (Marion Composites Division)
Allfast Fastening Systems Inc.
Alliant Aerospace Company
AT&T -- Government Markets
Bath Iron Works/General Dynamics
BF Goodrich Aerospace/BF Goodrich Aerostructures
The Boeing Company
The CNA Corporation
The CFM International, Inc.
Computer Sciences Corp.
Day & Zimmerman, Inc.
DRS Technologies, Inc.
Dyncorp
Frequency Electronics, Inc.
GE Aircraft Engines
General Dynamics Corp.
Georgia Tech Research Institute
Harris Corporation
Honeywell International
Howmet Castings
IBM Corporation
ITT Defense
Lear Siegler Services, Inc.
L-3 Communications Corporation
Lockheed Martin Corporation
Newport News Shipbuilding
Northrop Grumman Corporation
Parker Hannifin Corp.
Raytheon Company
Rockwell-Collins
SAIC
Sequa Corporation
Southwest Research Institute
Stewart & Stevenson
Teledyne Technologies Incorporated
Textron, Inc.
Thales, Inc.
Thiokol Propulsion
TRW Systems
UNISYS Corporation
United Defense LP
United Space Alliance

United Technologies Corporation
University of Dayton Research Institute
Veridian Corporation
Vought Aircraft Industries, Inc.
Williams International

Total: 47

1824004