



Shell Oil Company
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United States Sentencing Commission
One Columbus Circle, N.E.
Suite 2-500, South Lobby
Washington, DC 20002-8002
Attn.: Public Affairs

Re: Improvements to Organizational Guidelines

Shell Oil Company's Ethics and Compliance Office understands that you are considering appointing an advisory committee to develop proposals on the federal sentencing organizational guidelines for your consideration. We recommend that you form such an advisory committee, which would include, among others, representatives from corporate ethics and compliance offices.

If an advisory committee is formed, then we would also recommend that you instruct the committee to use a rigorous process, such as an "after action review" to structure its work. As you probably know, the after action review process is used widely by the United States military and is gaining support among corporations. The after action review process can be summarized in six steps:

1. What was the original intent of the action being reviewed?
2. What exactly happened and why?
3. What have we learned?
4. What do we know now and what actions should we take? The actions would include short-term, mid-term and long-term actions.
5. Take actions identified in 4.
6. Tell others who need to know what was learned.

We think following such a process will allow for better focus for the advisory group and will result in improved guidelines for corporations to use when developing their compliance programs.

Shell would be willing to send a corporate representative to participate in this important work.

Best regards,



Jerome Adams
Corporate Ethics and Compliance Officer