



October 19, 2001

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

To Whom It May Concern:

I am writing to express my support for the formation of an Organizational Guidelines Advisory Group. I was not only made aware of this proposal group by reading the Federal Register, but also from talking to a number of people, including Paula Desio of the U.S. Sentencing Commission. I briefly served on an advisory group of the USSC as it related to the Sentencing Guidelines. My role then was to bring out the importance of ethics to compliance in the communication and enforcement of the Guidelines. This advisory group was rather short-lived, and I see this proposal as a rebirth of such a group almost a decade later.

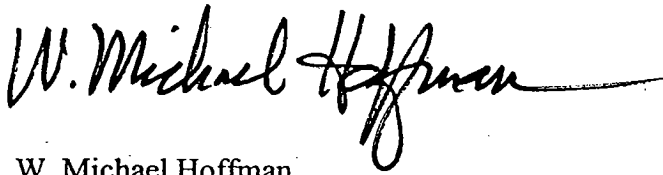
In reading the Prevention of Corporate Liability (Vol. 9, No. 9, October 15, 2001), I agree with the suggestions that have already been sent for improving the Guidelines, especially the effort to view compliance as an element of a broader integrity-based ethics program, and an effort to promote programs that reward ethical behavior. There is no doubt that the Sentencing Guidelines have played a major role in furthering the business ethics and compliance movement in corporate America and are playing a role in influencing similar efforts in other countries around the world. The USSC should be and is praised for these efforts, and the formation of a follow-up advisory group to strengthen the Guidelines should be seen as timely and important.

I would be pleased to serve on such a group if you think I could contribute. I have a lot of relationships in the business ethics academic community both here and abroad, and I have been working with corporations and other organizations in the area of business ethics for many years. Attached is my resume for your review.

Some of the largely academic associations, such as SBE, APPE, ISBEE, etc., could be very helpful and should be included as a source of ideas and support. I am also contacted by the media frequently, which could be helpful to the efforts of an advisory group, and I work with numerous laws firms in an expert witness/consulting capacity, which is another source of useful information with regard to what corporations are doing, or as is more often the case, not doing. I also serve as the Advisor to the Board of the Ethics Officer Association, an association which I helped to establish and served as the Executive Director of for its first five years.

I was encouraged to write to you with my offer to serve on this proposed advisory group by Paula Desio; however, whether I serve on the committee or not, I will be pleased to help the effort in whatever way I can.

Sincerely,

A handwritten signature in black ink, reading "W. Michael Hoffman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

W. Michael Hoffman
Executive Director

**PROFESSIONAL RESUME****BIOGRAPHICAL SUMMARY****W. Michael Hoffman, Ph.D.**

W. Michael Hoffman is the founding Executive Director of the Center for Business Ethics at Bentley College in Waltham, Massachusetts, a 25 year-old research and consulting institute and an educational forum for the exchange of ideas and information in business ethics.

Dr. Hoffman received his Ph.D. in Philosophy at the University of Massachusetts at Amherst in 1972. He is a Professor of Philosophy and was Chair of the Department of Philosophy for 17 years at Bentley. Dr. Hoffman has authored or edited 16 books, including Business Ethics: Readings and Cases in Corporate Morality (now in its 4th edition), The Ethical Edge: Tales of Organizations that Have Faced Moral Crises (1995), and Ethics Matters: How to Implement Values-Driven Management (2000). He also has published over 60 articles.

Dr. Hoffman has consulted on business ethics for universities, government agencies, and corporations, including The Ayco Company, Bath Iron Works, Cablevision Systems, CBS, Congress' Office of Technology Assessment, Coopers & Lybrand (now PricewaterhouseCoopers), Exelon Corporation, Fidelity Investments, GTE, General Electric, Glaxo (now Glaxo SmithKline), Hill and Knowlton, Junior Achievement, Johnson & Johnson, KPMG Peat Marwick, Long Island Lighting Company (now KeySpan Energy), Massachusetts Bay Transportation Authority, Niagara Mohawk Power Corporation, Northeast Utilities System, Northrop (now Northrop Grumman), NYNEX (now Verizon), Orange and Rockland Utilities, and TRW Systems. He has been a National Endowment for the Humanities Fellow and Consultant, a lecturer at universities and conferences around the world, and an expert witness on business ethics in numerous legal cases. He is on the board of editors of many business ethics journals, was a founding member and President of the Society for Business Ethics, and served on the advisory board of the U.S. Sentencing Commission. He was the founding Executive Director (1991-1995) and later a member of the Board of Directors (1995 - 1997) of the Ethics Officer Association; he is presently the Association's Advisor to the Board. He has been quoted extensively on business ethics in newspapers and magazines, including the Boston Globe, Business Week, Industry Standard, Los Angeles Times, New York Times, USA Today, U.S. News and World Report, Wall Street Journal, and Washington Post and is interviewed frequently for television and radio programs around the country.

Dr. Hoffman resides in West Newton, Massachusetts with his wife, Bliss Read Hoffman.