

November 16, 2006

ITT Industries
Attention: General Counsel's Office
4 W. Red Oak Lane
White Plains, NY 10604

Dear General Counsel of ITT:

The Project On Government Oversight (POGO) is overhauling and renewing its Federal Contractor Misconduct Database (www.pogo.org/db/index.cfm), a compilation of information from public resources regarding government contractors, including ITT. On February 27, 2006, we sent you information regarding findings relevant to ITT, which I have enclosed for your reference. As of today, we have not received a response from your office.

A written response is certainly in the best interest of everyone involved. It is the best way for your company to go on record regarding this process and the instances identified; your letter will be posted in its entirety on the database. Several companies have already responded and have expressed appreciation for the opportunity to express their views. POGO would prefer to receive a response by November 30, 2006 to ensure it is included with the launch of our new database.

If you have any questions, I can be reached at (202) 347-1122. Thank you for your time and consideration.

Sincerely,

Scott Amey
General Counsel

Enclosure

Instances of Misconduct

1.

James R. Woodruff v. Goulds Pumps/ITT Industries (Worker's Compensation)

Date: 05/19/2005 (Date of Administrative Agreement)

Misconduct Type: Labor

Contracting Party: Non-Governmental

Court Type: Civil

Amount: \$0

Disposition: Administrative Agreement

Synopsis: James Woodruff was an employee of Goulds Pumps when it was acquired by ITT Industries. After his retirement, he filed a claim for Workers Compensation through the New York Workers' Compensation Board because of hearing loss he had incurred on the job. ITT Industries was found to be responsible for Woodruff's insurance coverage.

2.

Hazardous Waste Violations

Date: 01/27/2006 (Date of Settlement)

Misconduct Type: Environment

Contracting Party: N/A

Court Type: Administrative

Amount: \$6,750

Disposition: Settlement

Synopsis: "Under the terms of a hazardous waste settlement with the U.S. Environmental Protection Agency, electrical parts manufacturer ITT Industries must pay a \$6,750 fine and fund a \$25,400 project that will reduce chemical use and the amount of waste generated from its Santa Ana, Calif. plant. In January 2005, the EPA inspected the Santa Ana facility. Based upon a January 2005 inspection, the EPA alleges that ITT Industries committed the following hazardous waste violations: storing hazardous waste without a permit; failure to close containers of hazardous waste; failure to maintain adequate aisle space... ITT Industries has since rectified the violations".

Document(s):

EPA Press Release