

February 27, 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. I have enclosed the findings relevant to ITT and am requesting verification or refutation of the data from you by March 10, 2006.

Any response would be greatly appreciated, as the accuracy of this information is in the best interest of all parties. Out of fairness to ITT, please be assured that any response received by POGO will be posted on the website along with the data.

Changes to the database include: the addition of more current instances, removal of Superfund cleanup costs, and removal of information that could not be verified with official documents. Additionally, pending cases will still be included, but this information will be kept separate from the resolved cases and will not be included in any totals.

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

Sincerely,

Kevin L. Phelps
Project Director

Enclosure

Instances

1.

Case Name: James R. Woodruff v. Goulds Pumps/ITT Industries, et. Al.

Date: May 19, 2005

Misconduct Type: Labor

Contracting Party: Non-Governmental

Court Type: Civil

Amount: N/A (insurance coverage)

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.

Documents to include:

http://www.courts.state.ny.us/reporter/3dseries/2005/2005_04108.htm (appeal made by insurance company)

<http://www.sec.gov/Archives/edgar/data/216228/000095012305003018/y05013exv21.txt> (under the heading Legal Proceedings)

2.

Case Name: In re ITT Industries

Date: 11/1/04

Misconduct Type: Import/Export

Contracting Party: International

Court Type: Administrative

Amount: \$8,000,000

Disposition: Administrative Agreement

Synopsis:

ITT Industries signed a Consent Agreement to settle alleged violations of the Arms Export Control Act in connection with the unauthorized export of night vision products and the unauthorized export of space remote sensing technical data and defense services.

Documents:

Charging letter, Order, Consent Agreement