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Mr. Jonathon Ingram
Securities and Exchange Commission
450 Fifth Street, NW
Washington, D.C. 20549

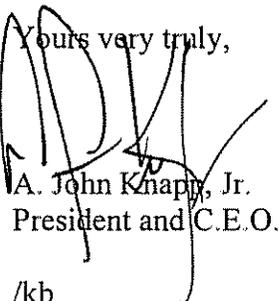
Dear Jonathon,

Last month you were kind enough to visit with us on the phone on the topic of Sarbannes Oxley and small cap firms such as ICO. Since that time, we've followed with interest some of the dialogue and resulting "chatter" on the prospects of a lighter version of SOX 404 for smaller cap firms. Certainly, there is evidence that the SEC is weighing carefully the feedback it has received on the costs and benefits of SOX 404 for these firms. For that consideration, we are most appreciative.

We at ICO, however, are now concerned about a definition of a "smaller public company" which we have read may be adopted by the SEC. Specifically, the definition of small cap that we've heard may be used is those firms that have market capitalization of between \$125 million and \$750 million and have revenues of less than \$250 million. Clearly, ICO, with revenues in fiscal 2005 of \$296,000,000, would not qualify if, indeed, such a definition is adopted.

As we wrote in our last letter, if we were a single location firm, SOX 404 would not be as significant a challenge. But as we have 18 facilities in 9 nations, SOX 404 is a true challenge, and is very costly, particularly relative to the benefits SOX 404 provides us. We believe that the SEC should find some manner of taking into account the degree of difficulty and cost relative to the size of the revenues and market capitalization of the firms under consideration.

Are there any means other than our letters that we might use to present our position? If there is, please let us know. And thank you again for your time.

Yours very truly,

A. John Knapp, Jr.
President and C.E.O.

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