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Our 147th Year

Re: File No. 265-23

Gehl Company applauds the SEC Advisory Committee on Smaller Public Companies for recommending scaled application of Sarbanes-Oxley Act of 2002. Gehl Company supports the Committee's recommendations to scale Section 404 compliance requirements with investor risk. Compliance should increase as investor risk increases.

We believe market capitalization is the true measure of investor risk and find no direct correlation between revenue and investor risk. Page 16 of the Committee's draft report states "equity market capitalization better measures total risk to investors . . . it is the most relevant measure in determining which companies initially should qualify for scaled securities regulatory treatment." We concur and, therefore, request the Committee remove the \$250 million revenue filter. The \$250 million revenue filter, in our opinion, is an unsupported, subjective value. The Commission's data included as attachments to the draft report, in our opinion, supports economies of scale using cost-benefit criteria at a much higher revenue level. We also believe revenue is susceptible to commodity market volatility with no corresponding change in market capitalization.

Gehl Company, a manufacturer of compact construction equipment, is a small cap company with market capitalization of \$400 million and annual revenues of \$500 million. Gehl Company's external audit fees increased 69% from 2003 to 2004 and an additional 9% from 2004 to 2005 due primarily to Section 404 compliance. Gehl Company operates in a highly competitive market and cannot pass these costs onto consumers. Ultimately, our shareholders bear these costs through lower earnings and lower market value. We believe our shareholders would be better served by eliminating external auditor involvement in the Section 404 process and returning the associated external audit fees to our shareholders.

Thank you for the opportunity to comment.

Sincerely,

Thomas M. Rettler
Vice President and Chief Financial Officer