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January 20, 2006  
2910 Croydon Dr. N.W.  
Canton, Ohio 44718

Commissioner Christopher Cox  
Securities and Exchange Commission  
Washington D.C. 20001  
CHAIRMAN'S  
CORRESPONDENCE UNIT

Dear Commissioner Cox:

Congratulations on your initiative to make disclosure of senior executive compensation for publicly held companies more inclusive and easier to analyze. Your commitment to more information to allow the market to remedy irrational excesses is the proper start.

Two additional disclosures are suggested below in an effort to improve the impact of these disclosures. Your staff of experts may well have better additional measures which serve to put this compensation in perspective. The point behind these measures is that the absolute size of compensation packages thus far has not slowed the egregious excesses.

1. Expressing the pay of the highest compensated officer as a percent of dividends paid to shareholders is a comparison to which owners of the company can relate. Admittedly, all companies do not pay dividends for valid reasons, but in aggregate a large portion of shareholder returns over time come from dividends. Creation of shareholder value via stock price appreciation is less appropriate for two reasons. Much of an individual stock's movement is correlated to the movement of the total stock market versus the company's performance. Secondly, stock price movement does not automatically translate into shareholder gain as stock prices fall as well as rise. The vast amount of executive pay and all dividends represent real cash payments.
2. Expressing the pay of the highest compensated officer as a multiple of the average pay of all other company employees is a comparison to which all company employees and the general public can easily relate.

As a retired chief financial officer of a NYSE Fortune 500 company which has responsibly and consistently rewarded its shareholders for over 100 years, I am very concerned with the excesses which our corporate governance structure has spawned. If the comparisons noted or other better ones do not correct these excesses, I fear regulatory measures, which are imperfect solutions, will likely result.

Thank you for your service to the strongest capital market system in the world and openness to improving its operation.

Sincerely,



Gene Little

