

IRVING A. WILLIAMSON

[REDACTED]

September 12, 2006

James M. Lyons
Designated Agency Ethics Official
Office of the General Counsel
U.S. International Trade Commission
500 E Street, S.W.
Washington, D.C. 20436

Dear Mr. Lyons:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner of the U.S. International Trade Commission.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any other person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to section 208(b)(1), or qualify for a regulatory exemption, pursuant to section 208(b)(2). I understand that, pursuant to section 208(a), the interests of the following persons are imputed to me: my spouse, minor children, or any general partner, any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In order to avoid potential conflicts of interest under section 208, I will not participate personally and substantially in any investigation or other particular matter that would have a direct and predictable effect on the financial interests of General Electric Co., or any other organization in which I have or may acquire an ownership interest, unless I first obtain a written waiver or qualify for a regulatory exemption, or dispose of my interests in those organizations.

I am the President and sole owner and employee of Williamson International Trade Strategies, Inc., a consulting firm. Upon confirmation, I will place Williamson International Trade Strategies, Inc. in an inactive status. Other than to pay any necessary fees and taxes required in order to keep the firm in existence, I will no longer provide professional services to the company or receive compensation for professional services except for those services provided prior to my entry into federal government service. The firm will remain in an inactive status during my tenure as Commissioner.

Furthermore, I will not participate personally and substantially in any particular matter that would have a direct and predictable effect on the financial interests of Williamson International Trade Strategies, Inc. unless I first obtain a written waiver or qualify for a regulatory exemption.

James M. Lyons

Page 2

In addition, pursuant to 5 C.F.R. § 2635.502, I will not participate in any particular matter involving specific parties in which a former client of mine through Williamson International Trade Strategies, Inc. is a party or represents a party, for one year after I have ceased providing services to that former client, unless I am authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from the board of Spence-Chapin Services to Families and Children.

Sincerely,

A handwritten signature in dark ink, appearing to read "Irving A. Williamson". The signature is fluid and cursive, with the first name "Irving" and last name "Williamson" clearly distinguishable.

Irving A. Williamson