

JANUARY 10, 2009

Rosalind A. Knapp
Designated Agency Ethics Official
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Dear Ms. Knapp:

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 Secretary of Transportation at the Department of Transportation.

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 18 U.S.C. §208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. §208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or 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.

I will divest my interests in the following entities within 90 days of my confirmation: Caterpillar, Inc. and Ford Motor Company. With regard to each of these entities, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver pursuant to 18 U.S.C. §208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. §208(b)(2).

I have been advised that the duties of the position of Secretary of Transportation may involve particular matters affecting the financial interests of the PNC Financial Services Group, Inc. The National City Savings and Investment Plan of my spouse contains PNC common stock that is substantially less than \$15,000 in value. The Department has determined that it is not necessary at this time for my spouse to consider divestiture of the PNC stock interest because the likelihood that my duties will involve any such matter affecting the financial interests of the PNC Financial Services Group is remote. Accordingly, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of this entity unless I first obtain a written waiver pursuant to 18

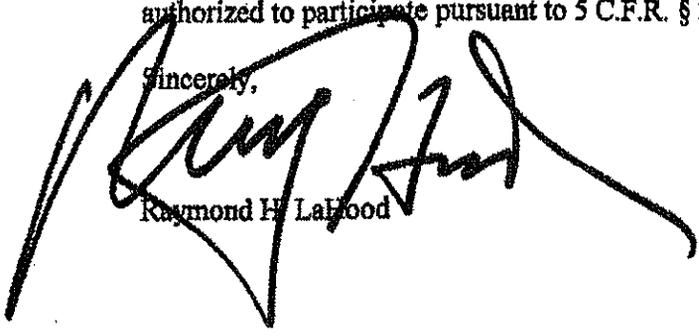
U.S.C. § 208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Upon confirmation, I will resign from the following positions: Co-Chair, International Maronite Foundation; Trustee, Arab American Fellowship; and Honorary Chairman, Arab American National Museum.

My spouse is an employee of Goodwill Industries of Central Illinois. I will not participate personally and substantially in any particular matter involving specific parties in which Goodwill Industries of Central Illinois is a party or represents a party, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

My spouse is an independent contractor who does work for the Council of American Overseas Research Centers. I will not participate personally and substantially in any particular matter involving specific parties in which the Council of American Overseas Research Centers is a party or represents a party, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Raymond H. LaHood', written over the typed name.

Raymond H. LaHood