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January 6, 2006

Jim Willis  
Director, Chemical Control Division  
U.S. Environmental Protection Agency  
Office of Pollution Prevention and Toxics  
1200 Pennsylvania Avenue, NW  
Mail Code: 7405M  
Washington, DC 20460

Re: VCCEP Tier 2 Commitment for PentaBDE and OctaBDE

Dear Mr. Willis,

This letter is to confirm the telephone call I had with Linda Gerber on December 19, 2005 in response to Charles Auer's letter of August 25, 2005 regarding EPA's data needs decision on Octabromodiphenyl ether and Pentabromodiphenyl ether. I informed Linda at that time that our company had decided not to sponsor either of these two substances under the remaining two tiers of the VCCEP program.

Given our decision in 2003 to cease all manufacture of these two substances by December 31 2004, sponsoring further VCCEP work on legacy products is not where we want to expend our resources. But even if we were still in the business, as we indicated in our June 15, 2001 commitment letter to sponsor these chemicals under VCCEP Tier 1, we did not anticipate sponsoring these substances in Tier 2 or 3.

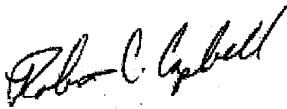
However this decision does not mean that all work will cease on Penta and OctaBDE. As you know, interest in the scientific community continues. With studies on-going at the National Toxicology Program on several PBDE's and researchers in Canada, Europe and North America continuing to look at toxicology, environmental fate and product life cycle issues, the data set will continue to grow, even without our participation.

With regards to the only commercial PBDE chemical (DecaBDE) we make, our company will be co-sponsoring the VCCEP Tier 2 submission and peer consultation through ACC-BFRIP. Please refer to the ACC commitment letter for additional details about that commitment.

Continued

If you have any questions or wish to discuss our decisions further, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Campbell". The signature is written in a cursive style with a large initial "R" and "C".

Robert Campbell  
Team Leader,  
Global Product Stewardship and Compliance