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October 31, 2008

CONFIDENTIAL TREATMENT REQUESTED

Florence E. Harmon, Acting Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Re: Notice of Representation Pursuant to Rule 8(b), 17 C.F.R. 200.735-8(b)

Dear Ms. Harmon:

This statement is filed in compliance with the Commission's notice of representation requirement.

I was formerly a senior assistant chief accountant in the ~~Division of Corporation Finance~~ and resigned effective May 29, 2008, to accept employment with the consulting firm of FTI Consulting. This is to advise you that I am being retained to represent (b)(4) in Division of Corporation Finance and Office of the Chief Accountant pre-filing matters regarding its Form 10-Q for the quarter September 30, 2008. The staff contacts at the Commission are (b)(6) of the Division of Corporation Finance. In the course of my representation of (b)(4) it is contemplated that I will appear before, or communicated with, the Commission or the staff of various offices of the Commission by telephone, correspondence, or otherwise.

While an employee of the Commission, to the best of my recollection, I did not have official responsibility for, nor did I participate personally or substantially in any matters regarding (b)(4)

Since my participation in this matter may continue for an indefinite period involving more than one communication with, or appearance before, the Commission or its staff, this statement is intended to cover all my appearances and communications that relate directly to Forms 10-K and 10-Q of (b)(4)

In addition, I request confidential treatment for this letter because it refers to a pre-filing consultation submission.

See Rule 8-4c, 17 C.F.R. 200.735-8(d)(3).

Sincerely,

Donald A. Walker, Jr.
FTI Consulting