



FEB 23 1996
ITT Corporation
World Headquarters
FEB 23 1 02 PM '96

February 23, 1996

Ms. Debbie Manzano
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Ms. Manzano:

This responds to your letter dated February 14, 1996. Our corporate situation, including the split of the former ITT Corporation into three independent corporations on December 19, 1995, was explained to the Commission in a letter of December 21, 1995 which accompanied an amended Form FEC 1. Basically, as a result of the split, there are three independent unaffiliated companies (each separately traded on the New York Stock Exchange), even though they have each retained the right to use "ITT" as part of their corporate name. A copy of our December 21, 1995 letter is enclosed.

The transfers referred to in your letter took place prior to the split. As a result of the split, we believe that we are no longer affiliated with the ITT Corporate Citizenship Committee (and a request for an Advisory Opinion will be submitted to confirm that understanding). As explained in the enclosed letter (second paragraph, last line), we understand the latter Committee to have become the separate segregated fund of ITT Industries, Inc., one of the three new independent corporations. I hope this clarifies matters. If you have any further questions, please feel free to give me a call at 212-258-1761.

Very truly yours,

Susan Knippenberg
Treasurer



ITT Corporation

World Headquarters

December 21, 1995

Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Sirs:

Enclosed please find an amended FEC Form 1, reflecting primarily that the Caesar's World Political Action Committee has changed its name to the ITT Corporation Political Action Council. This filing is occasioned by a fundamental corporate change which it may be useful to explain.

For many years, the entity known as ITT Corporation was a Delaware corporation. On December 19, 1995, that Delaware corporation completed a previously announced plan to split itself into three independent corporate entities. These are: (I) ITT Industries, Inc., an Indiana corporation (Industries); (II) ITT Corporation, a Nevada corporation (New ITT); and (III) ITT Hartford Group, Inc., a Delaware corporation. Despite the identical names of the former Delaware corporation and New ITT, it is Industries which is the legal successor to the former Delaware corporation. Accordingly, it is my understanding that the PAC which has been known as Corporate Citizenship Committee (ITT) is now the separate segregated fund of Industries.

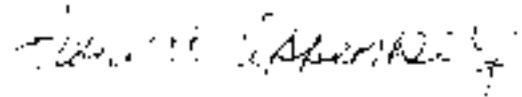
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Moreover, since the Caesars' World business is part of New ITT, it is New ITT which is the connected organization sponsoring what was formerly named the Caesar's World Political Action Committee. Thus, the reference in the enclosed to ITT Corporation indicates New ITT, not the former Delaware corporation.

Finally, I understand that, in prior filings, the Bank of Marin was listed as a depository. Please be advised that it is no longer a depository (and hence is omitted from item 9 of the enclosed).

Very truly yours,



Susan Knippenberg
Treasurer

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Federal Election Commission
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J. A. G.
PREPARER

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