Below are my comments on one specific draft policy:

Gender Pay Gap

You stated you were looking for other factors you might consider when deciding whether to support a proposal around gender pay gap reporting. What you should add to the issues to take into account is how the proposed compensation reporting by gender is asked to normalize the pay by job level. Family and other issues often cause women to voluntarily seek out less-demanding job assignments, which carry lower salaries. Any shareholder request to issue one-size-fits-all company-wide compensation figures by gender would be very misleading and should be rejected.

Regards, Brian Smith

Brian Smith, IRC| Director of Investor Relations | **esi** (Nasdaq:ESIO)| Phone 503-672-5760| Mobile 503-781-3472| smithb@esi.com