

James H. Zrust
Vice President - Tax

The Boeing Company
100 N Riverside MC 5003-4027
Chicago, IL 60606-1596

August 29, 2011

The Honorable Dave Camp
Chairman, House Ways and Means Committee
U.S. House of Representatives
1102 Longworth House Office Building
Washington, DC 20515-6348



Dear Chairman Camp:

In response to your inquiry of August 17, 2011, regarding "Question for the Record" (attached), we submit the following additional information.

Your question asks if in our testimony or during the questioning we referenced a "US effective rate" which differed from that which is reported to shareholders to describe such deviation.

In our testimony we stated "Unlike other large multinational companies, almost all of our current worldwide income is subject to U.S. tax, and our effective rate is generally between 31-33 percent". The reference to the "effective rate" above is the same as what is reported to our shareholders in our Annual Report and to the Securities and Exchange Commission in our 10K.

Attached please find a schedule summarizing the Company's effective income tax rate for years 2007 - 2010 as disclosed in our Annual Report and 10K. It should be noted that for years 2009 and 2010 the effective rate was distorted due to large one-time unusual events that are non-recurring in nature. These events are not considered part of the Company's normal operations and are specifically discussed as such in the Annual Report and 10K.

We respectfully submit this information for your review.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Zrust". The signature is stylized and written in a cursive-like font.

**The Boeing Company
Attachment**

Years ended December 31,	2010	2009	2008	2007
Effective income tax rate per 10K	26.50%	22.90%	33.60%	33.70%
<u>Adjusting Items:</u>				
Medicare Part D law change (Note 1)	-3.3%			
Federal audit settlement (Note 2)	8.2%			
2009 test airplane charge (Note 3)		7.4%		
Effective tax rate as adjusted	31.40%	30.30%	33.60%	33.70%

Note 1:

One-time income tax charge recorded during 2010 as a result of the Patient Protection and Affordable Care Act, as modified by the Health Care and Education Reconciliation Act of 2010 as disclosed in the 2010 10K page 70.

Note 2:

One-time income tax benefit recorded during 2010 as a result of settling the 1998-2003 federal audit as disclosed on page 70 of the 2010 10K.

Note 3:

Unique pre-tax charge of \$2,693 million recorded during 2009 had the effect of reducing the income tax provision by 7.4%. As discussed in the 2009 10K (see pages 18, 23, 26, 27 and 73), the company concluded that the first three flight-test 787 aircraft could not be sold as previously anticipated due to the inordinate amount of rework and unique and extensive modifications made to those aircraft. As a result, costs associated with these aircraft were expensed and reduced 2009 earnings.