

## SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

#### SCHEDULE 13D

Under the Securities Exchange Act of 1934 (Amendment No. 17)

Oil-Dri Corporation of America (Name of Issuer)

Common Stock Par Value \$0.10 Per Share (Title of Class of Securities)

677864100 (CUSIP Number)

Peter D. Goldstein GAMCO Investors, Inc. One Corporate Center Rye, New York 10580-1435 (914) 921-7732

(Name, Address and Telephone Number of Person Authorized to Receive Notices and Communications)

November 13, 2008
(Date of Event which Requires Filing of this Statement)

If the filing person has previously filed a statement on Schedule 13G to report the acquisition that is the subject of this Schedule 13D, and is filing this schedule because of  $\S\S$  240.13d-1(e), 240.13d-1(f) or 240.13d-1(g), check the following box .

CUSIP No.	677864100					
1	Names of reporting persons  I.R.S. identification nos. of above persons (entities only)					
	Gabelli Funds,					
	LLC 4044523				I.D. No. 13-	
2	Check the appropriate box if a m	ember of a grou	) (SEE INSTRUCTIONS)	(a)		
	Tr Tr					
	(L)					
	(b)					
3	SEC USE ONLY					
4	Source of funds (SEE INSTRUCT	TIONS)				
7	00-Funds of investment advisor					
5	Check box if disclosure of legal p	roceedings is re	uired pursuant to items 2 (d) or 2 (e)			
6	CITIZENSHIP OR PLACE OF ORGANIZAT	ION				
	New York					
	Number Of	: 7	SOLE VOTING POWER			
		:	44-00-7			
	Shares	: :	117,000 (Item 5)			
	BENEFICIALLY	: 8	SHARED VOTING POWER			
	Owned	:	None			
	OWNED	<u>:</u>	TONE			
	Ву Еасн	: 9	SOLE DISPOSITIVE POWER			
	REPORTING	:	117,000 (Item 5)			
	Dynasy	:	CHAPPE DANGERS POLICE			
	PERSON	:10 :	SHARED DISPOSITIVE POWER			
	$\mathbf{W}$ ITH	:	None			
11	AGGREGATE AMOUNT BENEFICIALLY O	WNED BY EACH RE	ORTING PERSON			
	117,000 (Item 5)					
12	CHECK BOX IF THE AGGREGATE AMOU	NT IN ROW (11) EX	CLUDES CERTAIN SHARES			
	(SEE INSTRUCTIONS)	,				
13	PERCENT OF CLASS REPRESENTED BY A	MOUNT IN ROW (1	)			
10			,			
	2.28%					
14	Type of reporting person (SEE IN	ISTRUCTIONS				
14	IA	1511CC11ON				
-						
			2			

CUSIP N	No. 677864100				
1	Names of reporting persons I.R.S. identification nos. of above	E PERSONS (ENTITIES ONLY)			
	GAMCO Asset Management, Inc.	GAMCO Asset Management,			
2		nember of a group (SEE INSTRUCTIONS)	I.D. No. 13-4044521 (a)		
	(b)				
3	SEC USE ONLY				
4	Source of funds (SEE INSTRUC 00-Funds of investment advisory				
5	Check box if disclosure of legal p	proceedings is required pursuant to items 2 (d) or 2 (e)			
6	CITIZENSHIP OR PLACE OF ORGANIZAT New York	TION			
	Number Of	: 7 Sole voting power			
	Shares	: : 514,625 (Item 5) :			
	BENEFICIALLY	: 8 Shared voting power			
	OWNED	: None :			
	By Each	: 9 Sole dispositive power			
	Reporting	: 559,925 (Item 5)			
	Person	:10 Shared dispositive power			
	With	: None			
11	Aggregate amount beneficially owned by each reporting person				
	559,925 (Item 5)				
12	CHECK BOX IF THE AGGREGATE AMOUNT IN ROW (11) EXCLUDES CERTAIN SHARES (SEE INSTRUCTIONS)				
13	PERCENT OF CLASS REPRESENTED BY A	AMOUNT IN ROW (11)			
	10.90%				
14	Type of reporting person (SEE II IA, CO	NSTRUCTIONS)			
		3			

CUSIP N	Io. 677864100				
1	NAMES OF REPORTING PERSONS I.R.S. IDENTIFICATION NOS. OF ABOVE GGCP, Inc.	PERSONS (ENTITIE	ONLY)	I.	
	No. 13-3056041				
2	Check the appropriate box if a member of a group (SEE INSTRUCTIONS)  (a)  (b)				
3	SEC USE ONLY				
4	Source of funds (SEE INSTRUCT None	TONS)			
5	Check box if disclosure of legal pr	oceedings is rec	uired pursuant to items 2 (d) or 2 (e)		
6	CITIZENSHIP OR PLACE OF ORGANIZATION New York	ON			
	Number Of	: 7	Sole voting power		
	Shares	:	None		
	Beneficially	: 8 :	Shared voting power		
	OWNED	:	None		
	Ву Еасн	: 9	Sole dispositive power		
	Reporting	:	None		
	Person	:10	SHARED DISPOSITIVE POWER		
	$\mathbf{W}_{\mathrm{ITH}}$	:	None		
11	AGGREGATE AMOUNT BENEFICIALLY OV	VNED BY EACH REI	DRTING PERSON		
	None				
12	CHECK BOX IF THE AGGREGATE AMOUNT IN ROW (11) EXCLUDES CERTAIN SHARES (SEE INSTRUCTIONS) X				
Percent of class represented by amount in row (11)					
	0.00%				
14	Type of reporting person (SEE IN HC, CO	STRUCTIONS			

CUSIP N	To. 677864100				
1	Names of reporting persons I.R.S. identification nos. of above GAMCO Investors, Inc.	E PERSONS (ENTITI	ES ONLY)		
	6 0 ;		I.D. No. 13-4007862		
2	Check the appropriate box if a n	nember of a gro	ар (SEE INSTRUCTIONS)		(a)
	(b)				
3	SEC USE ONLY				
4	Source of funds (SEE INSTRUC None	TIONS)			
5	Check box if disclosure of legal p	proceedings is re	equired pursuant to items 2 (d) or 2 (e)		
6	Citizenship or place of organizat New York	TION			
	Number Of	: 7	SOLE VOTING POWER		
	Shares	:	None		
	BENEFICIALLY	: 8	SHARED VOTING POWER		
	Owned	:	None		
	Ву Еасн	: 9	Sole dispositive power		
	REPORTING	:	None		
	Person	:10	SHARED DISPOSITIVE POWER		
	With	:	None		
11	Aggregate amount beneficially of	OWNED BY EACH RI	PORTING PERSON		
	None				
12	CHECK BOX IF THE AGGREGATE AMOUNT IN ROW (11) EXCLUDES CERTAIN SHARES (SEE INSTRUCTIONS) X				
13	PERCENT OF CLASS REPRESENTED BY	AMOUNT IN ROW (	11)		
	0.00%				
14	Type of reporting person (SEE II HC, CO	NSTRUCTION	5)		
			5		

CUSIP N	o. 677864100				
1	Names of reporting persons I.R.S. identification nos. of above Mario J. Gabelli				
2	2 Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a)				
	(b)				
3	SEC USE ONLY				
4	Source of funds (SEE INSTRUC None	TIONS)			
5	Check box if disclosure of legal p	proceedings is re	quired pursuant to items 2 (d) or 2 (e)		
6	CITIZENSHIP OR PLACE OF ORGANIZAT USA	TION			
	Number Of	: 7	Sole voting power		
	Shares	:	None		
Owned : None :					
	Ву Еасн	: 9	SOLE DISPOSITIVE POWER		
	REPORTING	: :	None		
	Person	:10 :	SHARED DISPOSITIVE POWER		
	<b>W</b> ITH	:	None		
11	Aggregate amount beneficially owned by each reporting person				
	None				
12	CHECK BOX IF THE AGGREGATE AMOUNT IN ROW (11) EXCLUDES CERTAIN SHARES (SEE INSTRUCTIONS) X				
13	PERCENT OF CLASS REPRESENTED BY	AMOUNT IN ROW (	1)		
	0.00%				
14	Type of reporting person (SEE II IN	NSTRUCTIONS			
			6		

#### Item 1. <u>Security and Issuer</u>

This Amendment No. 17 to Schedule 13D on the Common Stock of Oil-Dri Corporation of America (the "Issuer") is being filed on behalf of the undersigned to amend the Schedule 13D, as amended (the "Schedule 13D") which was originally filed on November 22, 2000. Unless otherwise indicated, all capitalized terms used herein but not defined herein shall have the same meanings as set forth in the Schedule 13D.

#### Item 2. <u>Identity and Background</u>

This statement is being filed by Mario J. Gabelli ("Mario Gabelli") and various entities which he

directly or indirectly controls or for which he acts as chief investment officer. These entities, except for LICT Corporation ("LICT"), engage in various aspects of the securities business, primarily as investment adviser to various institutional and individual clients, including registered investment companies and pension plans, and as general partner of various private investment partnerships. Certain of these entities may also make investments for their own accounts.

The foregoing persons in the aggregate often own beneficially more than 5% of a class of a particular issuer. Although several of the foregoing persons are treated as institutional investors for purposes of reporting their beneficial ownership on the short-form Schedule 13G, the holdings of those who do not qualify as institutional investors may exceed the 1% threshold presented for filing on Schedule 13G or implementation of their investment philosophy may from time to time require action which could be viewed as not completely passive. In order to avoid any question as to whether their beneficial ownership is being reported on the proper form and in order to provide greater investment flexibility and administrative uniformity, these persons have decided to file their beneficial ownership reports on the more detailed Schedule 13D form rather than on the short-form Schedule 13G and thereby to provide more expansive disclosure than may be necessary.

(a), (b) and (c) - This statement is being filed by one or more of the following persons: GGCP, Inc. ("GGCP"), GAMCO Investors, Inc. ("GBL"), Gabelli Funds, LLC ("Gabelli Funds"), GAMCO Asset Management Inc. ("GAMCO"), Teton Advisors, Inc. ("Teton Advisors"), Gabelli Securities, Inc. ("GSI"), Gabelli & Company, Inc. ("Gabelli & Company"), MJG Associates, Inc. ("MJG Associates"), Gabelli Foundation, Inc. ("Foundation"), Mario Gabelli, and LICT. Those of the foregoing persons signing this Schedule 13D are hereafter referred to as the "Reporting Persons". GGCP makes investments for its own account and is the parent company of GBL. GBL, a public company listed on the New York Stock Exchange, is the parent company for a variety of companies engaged in the securities business, including those named below.

GAMCO, a wholly-owned subsidiary of GBL, is an investment adviser registered under the Investment Advisers Act of 1940, as amended ("Advisers Act"). GAMCO is an investment manager providing discretionary managed account services for employee benefit plans, private investors, endowments, foundations and others.

GSI, a majority-owned subsidiary of GBL, is an investment adviser registered under the Advisers Act and serves as a general partner or investment manager to limited partnerships and offshore investment companies. As a part of its business, GSI may purchase or sell securities for its own account. It is the immediate parent of Gabelli & Company. GSI is the general partner or investment manager of a number of funds or partnerships, including Gabelli Associates Fund, Gabelli Associates Fund II, Gabelli Associates Limited, ALCE Partners, L.P., and Gabelli Multimedia Partners, L.P. GSI and Marc Gabelli own 45% and 55%, respectively, of Gabelli Securities International Limited ("GSIL"). GSIL provides investment advisory services to offshore funds and accounts. GSIL is an investment advisor of Gabelli International Gold Fund Limited, Gabelli European Partners, Ltd., and Gabelli Global Partners, Ltd.

Gabelli & Company, a wholly-owned subsidiary of GSI, is a broker-dealer registered under the Securities Exchange Act of 1934, as amended ("1934 Act"), which as a part of its business regularly purchases and sells securities for its own account.

Gabelli Funds, a wholly owned subsidiary of GBL, is a limited liability company. Gabelli Funds is an investment adviser registered under the Advisers Act which presently provides discretionary managed account services for The Gabelli Equity Trust Inc., The Gabelli Asset Fund, The GAMCO Growth Fund, The Gabelli Convertible and Income Securities Fund Inc., The Gabelli Value Fund Inc., The Gabelli Small Cap Growth Fund, The Gabelli Equity Income Fund, The Gabelli ABC Fund, The GAMCO Global Telecommunications Fund, GAMCO Gold Fund, Inc., The Gabelli Global Multimedia Trust Inc., The GAMCO Global Convertible Securities Fund, Gabelli Capital Asset Fund, GAMCO International Growth Fund, Inc., The GAMCO Global Growth Fund, The Gabelli Utility Trust, The GAMCO Global Opportunity Fund, The Gabelli Utilities Fund, The Gabelli Blue Chip Value Fund, The GAMCO Mathers Fund, The Gabelli Woodland Small Cap Value Fund, The Comstock Capital Value Fund, The Comstock Strategy Fund, The Gabelli Dividend and Income Trust, The Gabelli Global Utility & Income Trust, The Gabelli Global Gold, Natural Resources, & Income Trust, The Gabelli Global Deal Fund, Gabelli Enterprise M&A Fund, The Gabelli SRI Fund, Inc. and The Gabelli Healthcare & Wellness Rx Trust (collectively, the "Funds"), which are registered investment companies.

Teton Advisors, a subsidiary of GBL, is an investment adviser which provides discretionary advisory services to The GAMCO Westwood Mighty Mites<sup>sm</sup> Fund, The GAMCO Westwood Income Fund and The GAMCO Westwood Small Cap Fund.

MJG Associates provides advisory services to private investment partnerships and offshore funds. Mario Gabelli is the sole shareholder, director and employee of MJG Associates. MJG Associates is the Investment Manager of Gabelli International Limited, Gabelli International II Limited and Gabelli Fund, LDC. Mario J. Gabelli is the general partner of Gabelli Performance Partnership, LP.

The Foundation is a private foundation. Mario Gabelli is the Chairman, a Trustee and the

Investment Manager of the Foundation. Elisa Gabelli Wilson is the President of the Foundation.

LICT is a holding company with operating subsidiaries engaged primarily in the rural telephone industry. LICT actively pursues new business ventures and acquisitions. LICT makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, reinvesting, or trading in securities. Mario J. Gabelli is a director, and substantial shareholder of LICT.

Mario Gabelli is the majority stockholder and Chief Executive Officer of GGCP and Chairman and Chief Executive Officer of GBL. GGCP is the majority shareholder of GBL, in turn, is the sole stockholder of GAMCO. GBL is also the majority stockholder of GSI and the largest shareholder of Teton Advisors. Gabelli & Company is a wholly-owned subsidiary of GSI. The Reporting Persons do not admit that they constitute a group.

GBL, GAMCO, and Gabelli & Company are New York corporations and GSI and Teton Advisors are Delaware corporations, each having its principal business office at One Corporate Center, Rye, New York 10580. GGCP is a New York corporation having its principal business office at 140 Greenwich Avenue, Greenwich, CT 06830. Gabelli Funds is a New York limited liability company having its principal business office at One Corporate Center, Rye, New York 10580. MJG Associates is a Connecticut corporation having its principal business office at 140 Greenwich Avenue, Greenwich, CT 06830. The Foundation is a Nevada corporation having its principal offices at 165 West Liberty Street, Reno, Nevada 89501. LICT is a Delaware corporation having its principal place of business at 401 Theodore Fremd Avenue, Rye, New York 10580.

For information required by instruction C to Schedule 13D with respect to the executive officers and directors of the foregoing entities and other related persons (collectively, "Covered Persons"), reference is made to Schedule I annexed hereto and incorporated herein by reference.

(f) - Reference is made to Schedule I hereto.

### Item 3. <u>Source and Amount of Funds or Other Consideration</u>

Item 3 to Schedule 13D is amended, in pertinent part, as follows:

The Reporting Persons used an aggregate of approximately \$1,232,213 to purchase the additional Securities reported as beneficially owned in Item 5 since the most recent filing on Schedule 13D. GAMCO and Gabelli Funds used approximately \$1,134,377 and \$97,836 respectively, of funds that were provided through the accounts of certain of their investment advisory clients (and, in the case of some of such accounts at GAMCO, may be through borrowings from client margin accounts) in order to purchase the additional Securities for such clients.

#### Item 5. <u>Interest In Securities Of The Issuer</u>

Item 5 to Schedule 13D is amended, in pertinent part, as follows:

(a) The aggregate number of Securities to which this Schedule 13D relates is 676,925 shares, representing 13.18% of the 5,136,158 shares outstanding as reported in the Issuer's most recent Form 10-Q for the quarter ended July 31, 2008. The Reporting Persons beneficially own those Securities as follows:

Shares of Common Stock Common

Gabelli Funds 117,000 2.28%

GAMCO 559,925 10,90%

Mario Gabelli is deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons. GSI is deemed to have beneficial ownership of the Securities beneficially owned by Gabelli & Company. GBL and GGCP are deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons other than Mario Gabelli and the Foundation.

(b) Each of the Reporting Persons and Covered Persons has the sole power to vote or direct the vote and sole power to dispose or to direct the disposition of the Securities reported for it, either for its own benefit or for the benefit of its investment clients or its partners, as the case may be, except that that (i) GAMCO does not have the authority to vote 45,300 of the reported shares, (ii) Gabelli Funds has sole dispositive and voting power with respect to the shares of the Issuer held by the Funds so long as the aggregate voting interest of all joint filers does not exceed 25% of their total voting interest in the Issuer and, in that event, the Proxy Voting Committee of each such Fund may take and exercise in its sole discretion the entire voting power with respect to the shares held by such fund under special circumstances such as regulatory considerations, and (iv) the power of Mario Gabelli, GBL, and GGCP is indirect with respect to Securities beneficially owned directly by other Reporting Persons.

(c) Information with respect to all transactions in the Securities which were effected during the past sixty days or since the most recent filing on Schedule 13D, whichever is less, by each of the Reporting Persons and Covered Persons is set forth on Schedule II annexed hereto and incorporated herein by reference.

(e) Not applicable.

<u>Signature</u>

After reasonable inquiry and to the best of my knowledge and belief, I certify that the information set forth in this statement is true, complete and correct.

Dated: November 14, 2008

MARIO J. GABELLI

GGCP, INC.

GABELLI FUNDS, LLC

GAMCO ASSET MANAGEMENT INC

GAMCO INVESTORS, INC.

By:/s/ Douglas R. Jamieson

Douglas R. Jamieson

Attorney-in-Fact for Mario J. Gabelli

Director – GGCP, Inc.

President & Chief Operating Officer of the sole member of

Gabelli Funds, LLC.

 $\label{eq:President-GAMCO} President - GAMCO \ Asset \ Management \ Inc.$  President & Chief Operating Officer – GAMCO Investors, Inc.

## SCHEDULE I Information with Respect to Executive Officers and Directors of the Undersigned

Schedule I to Schedule 13D is amended, in pertinent part, as follows:

The following sets forth as to each of the executive officers and directors of the undersigned: his name; his business address; his present principal occupation or employment and the name, principal business and address of any corporation or other organization in which such employment is conducted. Unless otherwise specified, the principal employer of each such individual is GAMCO Asset Management, Inc., Gabelli Funds, LLC, Gabelli Securities, Inc., Gabelli & Company, Inc., Teton Advisors, Inc., or GAMCO Investors, Inc., the business address of each of which is One Corporate Center, Rye, New York 10580, and each such individual identified below is a citizen of the United States. To the knowledge of the undersigned, during the last five years, no such person has been convicted in a criminal proceeding (excluding traffic violations or similar misdemeanors), and no such person was a party to a civil proceeding of a judicial or administrative body of competent jurisdiction as a result of which he was or is subject to a judgment, decree or final order enjoining future violations of, or prohibiting or mandating activities subject to, federal or state securities law or finding any violation with respect to such laws except as reported in Item 2(d) of this Schedule 13D.

GGCP, Inc. Directors:

Vincent J. Amabile Business Consultant

Mario J. Gabelli Chief Executive Officer of GGCP, Inc., and Chairman & Chief Executive Officer of GAMCO Investors, Inc.; Director/Trustee

of all registered investment companies advised by Gabelli Funds, LLC; Chairman of LICT Corporation.

Marc J. Gabelli Chairman of The LGL Group, Inc.

Matthew R. Gabelli Vice President – Trading

Gabelli & Company, Inc. One Corporate Center Rye, New York 10580

Charles C. Baum Secretary & Treasurer United Holdings Co., Inc.

2545 Wilkens Avenue Baltimore, MD 21223

Douglas R. Jamieson See below

Joseph R. Rindler, Jr. Account Executive for GAMCO Asset Management Inc.

Fredric V. Salerno Chairman; Former Vice Chairman and Chief Financial Officer

Verizon Communications

Vincent Capurso Vice President Taxes, Barnes & Noble, Inc.

Vincent S. Tese Former Director GAMCO Investors, Inc.

Michael Gabelli Director

Officers:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer

Michael G. Chieco Chief Financial Officer, Secretary

GAMCO Investors, Inc.

Richard L. Bready

Directors:

Edwin L. Artzt Former Chairman and Chief Executive Officer

Procter & Gamble Company 900 Adams Crossing Cincinnati, OH 45202

Raymond C. Avansino Chairman & Chief Executive Officer

E.L. Wiegand Foundation Reno, NV 89501

Chairman and Chief Executive Officer

Nortek, Inc. 50 Kennedy Plaza Providence, RI 02903

Mario J. Gabelli See above

John D. Gabelli Senior Vice President

Eugene R. McGrath Former Chairman and Chief Executive Officer

Consolidated Edison, Inc.

Robert S. Prather President & Chief Operating Officer

Gray Television, Inc. 4370 Peachtree Road, NE Atlanta, GA 30319

Officers:

Mario J. Gabelli Chairman and Chief Executive Officer

Douglas R. Jamieson President and Chief Operating Officer

Henry G. Van der Eb Senior Vice President

Jeffrey M. Farber Executive Vice President and Chief Financial Officer

Christopher Michailoff Acting Secretary

GAMCO Asset Management Inc.

Directors:

Douglas R. Jamieson Regina M. Pitaro William S. Selby

Officers: Chief Investment Officer – Value Portfolios Mario J. Gabelli Douglas R. Jamieson President John Piontkowski Chief Operating Officer & Chief Financial Officer Chistopher J. Michailoff General Counsel and Secretary Gabelli Funds, LLC Officers: Mario J. Gabelli Chief Investment Officer – Value Portfolios Bruce N. Alpert Executive Vice President and Chief Operating Officer Agnes Mullady Vice President and President Closed-End Fund Division Teton Advisors, Inc. Directors: Bruce N. Alpert See above Douglas R. Jamieson See above Officers: Bruce N. Alpert Chairman Nicholas F. Galluccio Chief Executive Officer and President Gabelli Securities, Inc. Directors: Robert W. Blake President of W. R. Blake & Sons, Inc. 196-20 Northern Boulevard Flushing, NY 11358 Douglas G. DeVivo General Partner of ALCE Partners, L.P. One First Street, Suite 16 Los Altos, CA 94022 Douglas R. Jamieson President Officers: Douglas R. Jamieson See above Christopher J. Michailoff Secretary Chief Financial Officer Kieran Caterina Gabelli & Company, Inc. Directors: James G. Webster, III Chairman & Interim President Irene Smolicz Senior Trader Gabelli & Company, Inc. Officers: James G. Webster, III See Above Bruce N. Alpert Vice President - Mutual Funds LICT Corporation 401 Theodore Fremd Avenue Rye, NY 10580 Directors: Mario J. Gabelli See above - GGCP, Inc. Glenn J. Angiolillo P.O. Box 128 New Canaan, CT 06840 Alfred W. Fiore The Ross Companies

1270 Avenue of the Americas New York, NY 10020-1703 Salvatore Muoio

Principal S. Muoio & Co., LLC Suite 406 509 Madison Ave. New York, NY 10022

Gary L. Sugarman Chief Executive Officer

Richfield Associates 400 Andrews Street Rochester, NY 14604

Officers:

Mario J. Gabelli Chairman

Interim President and Chief Executive Officer, Chief Financial Officer Robert E. Dolan

General Counsel Thomas J. Hearity

# SCHEDULE II INFORMATION WITH RESPECT TO TRANSACTIONS EFFECTED DURING THE PAST SIXTY DAYS OR SINCE THE MOST RECENT FILING ON SCHEDULE 13D (1) SHARES PURCHASED AVERAGE DATE SOLD(-) PRICE(2)

#### COMMON STOCK-OIL DRI CORPORATION OF AMERICA

CAMCO	ACCETMAN	NAGEMENT INC.	

11/13/08	2,800	16.9898
11/13/08	2,700	17.0500
11/13/08	1,100	17.0000
11/12/08	500-	16.9980
11/12/08	2,300	17.1100
11/12/08	5,700	17.0131
11/11/08	240	17.3600
11/11/08	360	17.3406
11/11/08	300	17.3000
11/11/08	4,200	17.2931
11/11/08	1,800	17.1956
11/11/08	900	17.2489
11/11/08	600	17.2500
11/11/08	500	17.2640
11/11/08	300	17.2700
11/11/08	300	17.2900
11/10/08	900	16.0811
11/10/08	4,800	16.6692
11/10/08	700	16.2486
11/06/08	500-	15.5220
10/14/08	1,200	12.9992
10/13/08	600	13.0000
10/08/08	625-	14.6672
10/06/08	1,000-	14.9000
9/30/08	1,000	16.1500
9/25/08	500-	16.3907

(1) UNLESS OTHERWISE INDICATED, ALL TRANSACTIONS WERE EFFECTED ON THE NYSE.

(2) PRICE EXCLUDES COMMISSION.