



May 13, 2014

Barbara E. Mathews Vice President, Associate General Counsel, Chief Governance Officer and Corporate Secretary

Ms. Elizabeth M. Murphy Secretary U.S. Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549-1090

Re: File No. <u>4-659</u>, Petition for Rulemaking Under Section 13(f) of the Securities Exchange Act of 1934

Dear Ms. Murphy:



I am Corporate Secretary of Edison International, a company listed on the New York Stock Exchange, and am writing in support of the above-referenced joint petition filed by NYSE Euronext, the Society of Corporate Secretaries and Governance Professionals and the National Investor Relations Institute. Edison International recommends amending the beneficial ownership reporting rules under Section 13(f) of the Securities Exchange Act of 1934 in order to shorten the reporting deadline under paragraph (a)(1) of Rule 13f-1 from 45 days to two business days after the end of the calendar quarter.

We are also supportive of more regular reporting of ownership positions to match the short-sale reporting standards under the Dodd-Frank Act. This would provide for much more current information on positions developments within a quarter that might otherwise go undisclosed. We understand legislative action may be required to make this change.

We believe effective and timely communication with investors is important and more timely knowledge of changes in ownership positions would make our dialogue and investor communications that much more effective. It is also important to have the best information available on who our major owners are as we look to understand their views on governance matters and to communicate our points of view. This is particularly important for a company such as Edison International that is largely held by institutions (approximately 82% of our common stock was represented in Section 13(f) reporting as of December 31, 2013).

We also believe that the same technology that allows for updates daily on ownership prices and positions at individual brokerage accounts and benefit plan accounts can also be utilized to provide much more timely information on ownership positions. There doesn't seem to be a good reason for institutional investors to be allowed to delay disclosure of positions for up to four months under the current rules.

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Thank you for the opportunity to comment on this important issue.

Bushara Martens

Sincerely,