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March 9, 2007

Ms. Nancy M. Morris, Secretary
Securities Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Subject: File Number S7-03-07, Internet Availability of Proxy Materials

Dear Ms. Morris:

Commerce Financial Printers Corp. ("CFP") is a financial printer that provides EDGAR Filing, typesetting and printing services to more than 700 companies. CFP is an affiliate of Registrar and Transfer Company, a registered transfer agent for more than 1,600 CUSIPS. CFP, founded in 1983, has extensive experience assisting publicly traded companies produce their financial reports and proxy materials. CFP already provides web-hosting services for electronic delivery of Proxy Materials where shareholders provide written consent for such delivery. CFP appreciates the opportunity to comment on the proposed regulations referenced above.

CFP fully supports the SEC initiatives to cut needless expenses, to improve the competitiveness of corporate America. We applaud the Notice and Access initiative provided in the earlier rulemaking, S7-10-05. However, the Proposed Rule as drafted fails to take into consideration the practical side of the preparation of the Proxy Materials. Most companies for which we provide printing service, more than 70%, cannot today have their Proxy material ready for printing and posting to web sites until after the 40-day posting deadlines stipulated in the earlier regulation, S7-10-05, and in the proposed regulation noted above.

Many companies have always had problems finalizing and approving financial reports in this timeframe. Since the advent of Sarbannes-Oxley ("SOX"), delays in the approval of these materials have become prevalent. Because of the sensitivity to the accuracy of these statements, auditors, accountants and lawyers require additional review to ensure the accuracy of this critical work. Besides being costly, these efforts take time and have delayed the availability of these items for printing and posting on an Internet site well beyond the 41 days required by the earlier regulation. Frequently, we receive approval to print these materials the day before or on the statutory required mailing date.



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We expect that some larger companies may find it easier or be sufficiently financially motivated to expedite the approval and release of Proxy Materials to meet the deadline required by the Notice and Access model. However, our experience indicates that most companies, despite rush production charges, cannot meet these deadlines.

We have concluded that the majority of small and mid-sized companies will probably not be able to take advantage of the Notice and Access model. Further, the proposed rule making the Notice and Access model mandatory creates a conflict with efforts to comply with an earlier statute, SOX.

We would like to thank the Commission for the opportunity to present these concepts and again applaud the development of the Notice and Access initiative.

Respectfully,

A handwritten signature in cursive script, appearing to read "Thomas L. Montrone", is written over a horizontal line.

Thomas L. Montrone