

IBEW LOCAL 110

Affiliated with the AFL-CIO



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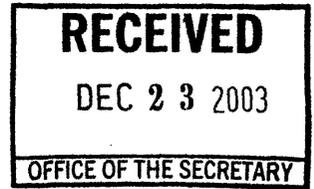
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December 17, 2003



Mr. Jonathan G. Katz, Secretary
Securities and Exchange Commission
450 Fifth Street NW
Washington, DC 20549

Re: File No. S7-19-03

Dear Mr. Katz:

I am the Business Manager/Financial Secretary of IBEW Local #110 in St. Paul, Minnesota. I represent 2,200 members who are participants in the St. Paul Electrical Workers Defined Benefit Pension Plan and the St. Paul Electrical Workers Supplemental Pension Plan, a defined contribution plan.

This letter is written in support of the Securities and Exchange Commission Proposal S7-19-03 regarding security holder director nominations. Our two pension plans invest over 150 million dollars in companies, therefore we feel it is appropriate that we have the right to put forward director candidates on these company ballots. We are significant shareholders and our voice should be heard.

Respectfully yours,

Richard J. Vitelli
Business Manager/Financial Secretary
IBEW Local 110

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