

Ms. Vanessa Countryman
Secretary
United States Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Re: Application of Green Impact Exchange, LLC for Registration as a National Securities Exchange under Section 6 of the Securities Exchange Act of 1934 (File No. 10-244)

Dear Ms. Countryman,

I am writing to express my strong support for the Green Impact Exchange's (GIX) application to become a registered national securities exchange. By way of background, I was the former CEO of Kellogg Capital Markets (KCM), a specialist firm on the New York Stock Exchange (NYSE) and the America Stock Exchange (AMEX) that made markets in over 800 stocks, representing more than 10% of listed equities at the time. As such, I bring a unique perspective on the importance of transparency, trust, and sustainability in the financial markets.

During my tenure at KCM, one of our core responsibilities as specialists on the NYSE and AMEX was maintaining regular contact with the CEOs, CFOs, and Boards of the companies we represented. This close relationship provided me with an in-depth understanding of the concerns and priorities of corporate leadership regarding their companies' stock trading. It became abundantly clear to me that transparency and open communication with investors are crucial for maintaining investor trust and, by extension, the company's market value.

In addition to my experience at KCM, I am one of the owners of an insurance company, IAT Group. Insurance companies are, by necessity, deeply engaged in the challenges posed by climate risk – indeed, they are on the front lines of this issue, as the increase in severe weather events and other effects of climate change are forcing the industry to reconsider how risks are rated and what can and cannot be insured. These changes are not only reshaping the insurance landscape but are also raising the costs and risks for businesses that rely on insurance as a critical component of their risk management strategies.

My background extends as well to environmental conservation, through my work as president of the Arthur M. Bartley Chapter (New York) of Ducks Unlimited, a not-for-profit organization that has worked on wetlands conservation and habitat preservation for waterfowl since 1938. Since its inception, DU has raised more than \$3.5 billion for conservation, which has funded the preservation of nearly 13 million acres of wetlands across North America through land purchases and conservation easements; research into forestry practices that impact biodiversity among waterfowl; and education on how responsible management and use of wetlands, watersheds, river basins and boreal forests

promotes biodiversity. DU currently has conservation initiatives in virtually every ecosystem across the United States and Canada.

Given this context, the Green Impact Exchange's initiative to engage companies in sustainability, and to reward them for being more transparent with investors about their sustainability commitments is both timely and essential. In today's market, where sustainability is not just a fad but a critical component of a company's long-term success, it is imperative that investors have clear and accurate information to guide their decisions. By incentivizing companies to make credible commitments to sustainability and be more forthcoming about their environmental efforts, GIX will help investors identify and support those companies that are genuinely committed to sustainable practices.

Moreover, transparency in a company's operations, particularly concerning sustainability, is not just beneficial for investors; it is essential for building and maintaining trust. When companies are open with their stakeholders, they lay the foundation for a stronger, more resilient relationship with their investors. This trust, in turn, contributes to the long-term value of the company, ensuring that it remains an attractive option for investors who are increasingly prioritizing sustainability in their portfolios.

From the perspective of a former market maker, a current board member of an insurance company, and an engaged supporter of conservation efforts, I can confidently say that the approval of GIX's application would represent a significant advancement in fostering a more transparent, trustworthy, and sustainable financial marketplace. It will provide a much-needed platform for companies that are committed to sustainability and transparency and will empower investors to make more informed decisions.

I urge the Securities and Exchange Commission to approve GIX's application, as it aligns perfectly with the evolving needs of the market and the increasing importance of sustainability in risk management.

Thank you for your consideration.

Sincerely,



Charles K. Kellogg
Former CEO, Kellogg Capital Markets
Board Member, IAT Insurance Group