

City and County of Swansea Pension Fund
Cronfa Bensiwn Dinas a Sir Abertawe



Administered by

Elizabeth M Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Please ask for:
Gofynnwch am: Mr Jeff Dong
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Date: 18th February 2011
Dyddiad:

Re: File No. 4-617, Study on Extraterritorial Private Rights of Action

Dear Secretary Murphy:

We write on behalf of **The City & County of Swansea Pension Fund**, a county council pension fund located in **Swansea, Wales, United Kingdom** which has assets totaling approximately \$1.6bn that are invested for the benefit of our members. A significant portion of those investments are in securities that are publicly traded throughout the world, including in the U.S.

We understand that the Strathclyde Pension Fund, located in Glasgow, Scotland with \$16 billion in assets has submitted a letter in response to the October 25, 2010, Securities and Exchange Commission release pursuant to Section 929Y of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"), which release invited comments by members of the public about a proposed study to determine the extent, if any, to which private rights of action under the antifraud provisions of the Securities Exchange Act of 1934 (the "Exchange Act") should be extended to cover transnational securities fraud.

We have reviewed the Strathclyde letter and endorse its position that the "conduct and effects" test provisions of the Dodd-Frank Act, Section 929P(b), should be extended to private litigants.

Yours sincerely,

Jeffrey Dong,

Chief Treasury Officer,

City & County of Swansea Pension Fund



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