



MARYLAND
STATE RETIREMENT
and PENSION SYSTEM

STATE RETIREMENT AGENCY
120 East Baltimore Street
Baltimore, MD 21202
Tel: 410-625-5555
1-800-492-5909
TDD/TTY 410-625-5535
sra.maryland.gov

BOARD OF TRUSTEES
Nancy K. Kopp
Chairman

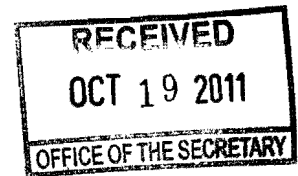
Peter Franchot
Vice Chairman

David S. Blitzstein
William D. Brown
John W. Douglass
T. Eloise Foster
James M. Harkins
Sheila Hill
F. Patrick Hughes
Major Morris L. Krome
Theresa Lochte
Robert W. Schaefer
Harold Zirkin
Thurman W. Zollicoffer, Jr.

R. Dean Kenderdine
Executive Director
Secretary To The Board

SN # 10

October 14, 2011



Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, Northeast
Washington, D.C. 20549

Re: File No. 4-637, Petition to Require Public Companies to Disclose to Shareholders the Use of Corporate Resources for Political Activities

Dear Ms. Murphy,

The Maryland State Retirement Agency (Agency) is the administrator of the Maryland State Retirement and Pension System (System), a multiple-employer public employee retirement system. The System was established by the State Personnel and Pensions Article of the Annotated Code of Maryland to provide retirement allowances and other benefits to State employees, teachers, and other State and local employees. Responsibility for the System's administration and operations is vested in a 14-member Board of Trustees (Board). As of June 30, 2011, the System's assets totaled US\$37.5 billion.

The Board is committed to actively addressing corporate governance and regulatory constructs, and issues that affect the integrity of the capital markets and market participants, utilizing the tools and methods available to proponents of good corporate governance. To this end, the Board has established a Corporate Governance Committee that provides guidance in connection with corporate governance matters, including communications with companies, communications with regulatory agencies, and in matters before governance organizations.

In this context, the System would like to voice its support for the petition that was sent to you on August 3, 2011 by the Committee on Disclosure of Corporate Political Spending Petition for Rulemaking, advocating a rulemaking project to require disclosure of corporate political spending to public company shareholders. The System concurs with this group of academic experts in corporate and securities law that more robust disclosure of corporate political spending is of interest to investors. The System believes this matter is particularly relevant in the United States given last year's Supreme Court decision in *Citizens United v. FEC*, which confirmed the rights of U.S. companies to provide funding for political purposes.

The System recognizes that corporate political activity can be positive. However, when corporate resources are deployed to seek political influence, there is also potential for abuse. This can lead to serious breaches of business ethics, particularly when influence is sought in ways that are not consistent with promoting the long-term interests of the company and its investors. Given these concerns, the System believes that disclosure of corporate political spending is a basic step to ensure transparency and accountability of corporations to their investors, and has included it in its proxy voting guidelines.

Ms. Elizabeth M. Murphy
October 14, 2011
Page 2

We hope this puts into a clearer context our support of the petition put forward by the Committee on Disclosure of Corporate Political Spending Petition for Rulemaking, and from our perspective as investors we encourage the Securities and Exchange Commission to adopt the rulemaking project on corporate political spending as outlined in this petition.

If you would like to discuss any of these points, please do not hesitate to contact Victoria Willard, CFA, via phone at 410-625-5614 or email at vwillard@sra.state.md.us.

Sincerely,



R. Dean Kenderdine
Executive Director
Secretary to the Board

RDK/vw

cc: Mary Schapiro, Chairman, Securities and Exchange Commission
Board of Trustees