



**Allegheny Technologies Incorporated**  
1000 Six PPG Place  
Pittsburgh, PA 15222-5479 U.S.A.  
Tel: 412-394-2800  
Fax: 412-394-2837  
www.ATImetals.com

February 12, 2013

*Via Courier*

Elizabeth M. Murphy  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-0609



Re: File No. 4-659  
Petition for Rulemaking Under Section 13(f) of the Securities Exchange Act of 1934

Dear Ms. Murphy:

I am writing this letter on behalf of Allegheny Technologies Incorporated ("ATI") to express ATI's strong support for the petition for rulemaking under Section 13(f) of the Securities Exchange Act of 1934, as amended, submitted to the U.S. Securities and Exchange Commission (the "Commission") by NYSE Euronext, along with the Society of Corporate Secretaries and Governance Professionals and the National Investor Relations Institute, on February 1, 2013 (the "Petition"). For the reasons set forth in the Petition, ATI believes that a reduction in the quarterly reporting deadline contained in Rule 13f-1 from the current deadline of 45 days after the last day of an applicable calendar quarter to a deadline of two business days after the last day of such a calendar quarter would provide important information to public companies and investors in a more timely manner, as well as increasing overall transparency to the investing public.

In particular, ATI believes that the current 45-day reporting period far exceeds the amount of time reasonably needed by institutional investment managers to report their holdings given available technological capabilities. Such delay unnecessarily introduces elements of mystery for public companies such as ATI, as our ability to timely identify current institutional investors and their holdings is hindered during important times of the year, such as in advance of proxy solicitations, when companies frequently engage stockholders with respect to important matters on which proxies will be solicited. For public companies such as ATI, having earlier access to the information contained in Form 13F filings would significantly assist in our efforts to facilitate more productive stockholder dialogue, as well as increase transparency for the investing public as a whole.

For these reasons, as well as the other reasons set forth in the Petition, we encourage the Commission to implement the amendment to Rule 13f-1 described in the Petition.

Sincerely,

A handwritten signature in black ink that reads "Richard J. Harshman".

Richard J. Harshman  
Chairman, President and Chief Executive Officer

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