



November 30, 2018

Hon. Jay Clayton
Chairman
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: File 4-725, Staff Roundtable on the Proxy Process

Dear Chairman Clayton:

Dana Investment Advisors is an investment manager with \$7.1 billion in assets under management. Our clients include institutions (pension funds, endowments and foundations, hospitals, schools) and individual investors. As a member of the Interfaith Center for Corporate Responsibility (ICCR), Dana supports the comment letter ICCR sent to the SEC on November 6, 2018.

The shareholder resolution process, as currently practiced under Rule 14a-8, serves as an invaluable tool to both shareholders and companies, that brings to light emerging environmental, social, and governance risks and addresses them before the long-term health of companies is negatively affected.

We hope the current rules governing the proxy process will be preserved.

Thank you,

A handwritten signature in blue ink that reads "Ann Roberts". The signature is fluid and cursive.

Ann Roberts
ESG Analyst

