

June 15, 2021

Dear Chair Gensler,

As a previous bank controller and risk manager and a current academic, who has dedicated the past 5 years to the subject of sustainability accounting and reporting, I am encouraged by and welcome the opportunity to respond to the Securities and Exchange Commission's (SEC's) request for public input on climate-related financial disclosure. I fully support the SEC's interest and initiative(s) around sustainability-related financial disclosure. Just as our capital markets have benefited greatly from generally accepted accounting principles (GAAP), I believe the time is already upon us to benefit from generally accepted sustainability principles (GASP). No pun intended, still humans and animals are found gasping for clean air, clean water, and secure shelter in an already shifting climate.

I'll keep this comment letter brief, as I am essentially writing, to you and your fellow commission members, in support of the extensive and well referenced response you received from the Sustainability Accounting Standards Board's (SASB) CEO Janine Guillot, on May 21, 2021.

In that May 21<sup>st</sup> response, you'll find support for two critically important points:

1. The urgency of mandatory disclosures of material information, beyond those captured under GAAP.
2. The established precedents for the SEC and other federal agencies to rely on third-party standard setters, e.g., FASB & COSO.

I write to you to implore you to see that, because of the existing urgency of this issue and the immediate availability of a high quality third-party standard setter, your best most efficient path to promoting required quality disclosures on climate change, and more, is to endorse the work done by SASB and the Task Force on Climate-related Financial Disclosures (TCFD). There isn't time available to reinvent these wheels, nor the necessity to do so, as evidenced by the numerous early adopters.

Thank you for your time and consideration. I look forward, hopefully, to seeing the results of your deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy G. Coville".

Dr. Timothy G. Coville, MBA, CPA  
Associate Professor  
Dept. of Accountancy  
St. John's University  
Queens, NY 11439