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NEUBERGER BERMAN

November 15, 2010

Ms. Mary L. Schapiro
Chairman
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: SEC Initiatives under the Dodd-Frank Act – Special Disclosures Section 1502 (Conflict Minerals)

Dear Ms. Schapiro:

The Neuberger Berman Socially Responsive Fund (\$1,240 million AUM as of 9/30/2010) has long been a committed shareholder among the socially responsible investor community, with a deep appreciation for the value of disclosure and the material impact a company's ESG performance record can potentially have on its bottom line. Integrating financial and ESG research into our long-term fundamental analysis has always been a key component of our investment process and due diligence since inception in 1994. We continue to pursue a standard method of ESG reporting requirements in order to drive transparency and accountability.

NB SRI believes responsible supply chain risk management can be an indicator of quality management. We encourage companies to incorporate and disclose sustainable practices throughout their supply chain. We believe that the sourcing of conflict minerals sourced from within or outside the Democratic Republic of Congo (DRC) cannot only fuel human rights atrocities, but also potentially expose companies and shareholders to supply disruptions and reputational risks. In late 2009, we became signatories to the *Investor Statement regarding Conflict Minerals from the Democratic Republic of the Congo* along with a coalition of 59 investors, representing almost \$200 billion in assets under management.

Today we are writing to underscore the importance of comprehensive disclosure standards as they relate to a company's supply chain and risk exposure to sourcing minerals from areas of conflict. We encourage the SEC to provide meaningful standards and guidance that will drive greater transparency and that takes into consideration the challenges corporations face in regards to the appropriate timeframe and resources for implementing a reliable and credible process.

We appreciate the opportunity to submit comments in advance of the proposed regulation. As long-term investors, we look forward to the implementation of comprehensive ESG reporting as it relates to the sourcing of conflict minerals throughout the supply chain.

Sincerely,


Ingrid Dyott
Portfolio Manager and Managing Director
Neuberger Berman Socially Responsive Fund (NB SRI)