

# **FINISH LINE**

March 8, 2017

The Honorable Michael S. Piwowar  
Acting Chairman  
Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549-0213

Dear Chairman Piwowar,

The Finish Line, Inc. (FINL) is pleased to provide comments to the Securities and Exchange Commission on the CEO Pay Ratio Disclosure.

First, we would like to provide some background on our company. FINL is a premium retailer of athletic shoes, apparel and accessories. Headquartered in Indianapolis, Finish Line has approximately 980 Finish Line branded locations primarily in U.S. malls and shops inside Macy's department stores across 47 states. FINL employs more than 14,000 employees and approximately 10,000 of those employees are part-time.

FINL does not believe the CEO Pay Ratio will provide investors with meaningful information that will be helpful in making decisions regarding the company's operations. Investors have access to more information than ever on how companies design executive-pay programs. While FINL is not opposed to meaningful disclosure, we believe that the disclosure required in this instance will not be helpful to investors.

Any value that the ratio may provide will be negated due to the inclusion of part-time and temporary employees especially in an industry like retail. The retail industry employs nearly twice as many temporary, part-time and entry-level workers compared with other industries. Given the nature of these positions, the earnings of part-time and temporary workers are not comparable to those of full-time employees. By including retail's part-time workforce, the rule presents a highly distorted view of actual pay rates and inaccurately inflates the ratio of CEO to worker pay.

The costs of providing the information required by the CEO Pay Ratio Disclosure will be significant. The requirements of the rule are detailed and complex. This will require significant analysis, effort and time to comply. Many companies will have to pay outside resources to complete this work. Finish Line estimates that the cost to provide this disclosure will be between \$30,000 and \$40,000 annually. The cost to comply with this regulation when compared to the minimal, if any, benefit to investors makes it clear that the CEO Pay Ratio should be reconsidered.

FINL asks for reconsideration of the CEO Pay Ratio Disclosure mandate in the Dodd-Frank Act. We appreciate the opportunity to be heard.

Sincerely,



Chris Eck  
SVP, Legal & HR, General Counsel & Corp Secretary

Finish Line, Inc.  
3308 North Mitthoeffer Road  
Indianapolis, IN 46235

**FINISHLINE.COM**