

Brock d'Avignon

Elmira, CA

United States

Elizabeth M. Murphy
Secretary
U.S. Securities and Exchange Commission
100 F St. NE
Washington, DC 20549-1090

Re: Pay Ratio Disclosure, File No. S7-07-13

Dear Ms. Murphy,

I am an investor.

As an advocate of Understandable Operating Reports that show that tool users or labor gets 37-cents of any sales dollar in a heavy industrial company, and tool providers like stockholders get 2.5-cents, it makes sense to see what portion of that 37-cents is top executive management pay. It has been more and more confusing government regulations that have caused K reports to be indecipherable except to tax accountants and even then they have contests to see where errors are in compliance to contridictory rules of reporting. I do not think asking the SEC to create more of the same garble is the answer as much as Sum Of Us would prefer you to address stockholder organizations directly for being able to summarize the sales dollar of companies as the American Economic Foundation has done for many years also adding on one page the categories of Payments to Suppliers, Payments for Tools Wearing Out, Payments to Government, and Retained Earnings to Grow the Corporation. The National Accounting Standards Board is another outfit that can question annual reports lack of inflation and borrowing shifts in the value of money itself. When inflation is 17% per year or borrowing debt is liquidating the money supply, all profit (Payments to Tool Providers, yourself or others) disappears. More focus on that too should be done simultaneously to transparency in Understandable Operating Reports.

Call 831-214-5991 if you want to know more. Thanks for your well meaning effort but it will work better if you ask stockholders to demand it as distinct from the laziness of mind delegated to the SEC that will pretend to do the job.

Sincerely,

Brock d'Avignon