



22 West Washington Street
Chicago
Illinois 60602

Telephone: +1 312 696-6000
Facsimile: +1 312 696-6001

July 20, 2015

Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: Request for Extension of Comment Period, Proposed Rule on Investment Company Reporting Modernization; Release No. 33-9776; File No. S7-08-15

Dear SEC Staff,

Morningstar, Inc. requests at least a 30-day delay in the deadline for submission of comments relating to the SEC's Proposed Rule on Investment Company Reporting Modernization.

Morningstar, Inc. is an independent, global financial research firm with a long history of supporting transparency in financial markets. As such, we strongly support the SEC's initiative to improve the quality, consistency, and comprehensiveness of the information that it receives from investment companies. We believe the SEC's regulatory initiative will result in increased investor protections while, at the same time, allowing the SEC to better monitor potential systemic risks to financial markets.

The proposed rule is extensive, with more than 200 separate requests for comments. Morningstar wishes to provide comprehensive, detailed feedback to the SEC. We appreciate having the opportunity to engage in dialogue with SEC staff members regarding the proposed rule. Based on these discussions, as well as our analysis of the proposal, we believe that providing at least a 30-day extension to submit comments would allow us to improve the quality of the research supporting our final submission.

We look forward to working with the SEC to improve the information available to both investors and the Commission. Thank you for your consideration of this request for an extension to the comment period. If you have any questions about our request, please do not hesitate to contact me ([REDACTED]), Sagar Patel ([REDACTED]), or Ben Alpert ([REDACTED]).

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Scott Cooley".

Scott Cooley
Director of Public Policy Research
Morningstar, Inc.