

August 25, 2020

Ms. Vanessa A. Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-1090

RE: Reporting Threshold for Institutional Investment Managers, Release No. 34-89290; File No. S7-08-20

Dear Ms. Countryman:

On behalf of Enerpac Tool Group Corp. (NYSE: EPAC), a premier industrial tools and services company headquartered in Menomonee Falls, Wisconsin, I am writing to express our opposition to the Commission's proposed amendments to the Form 13F reporting rules for institutional investment managers.

We believe that the SEC's proposal, would result in a significant loss of market transparency to our company along with many others. The proposed rule, if enacted, would deprive us of timely information about investment funds that may make significant investments in our shares and impair engagement with shareholders about our long-term strategy and corporate governance. Public companies, such as ourselves and others, are not well served by providing anonymity to institutional investment managers. How can we effectively communicate with our shareholders if we do not know who owns our shares?

The current 13F reporting allows companies insight into who is holding its shares and engage in shareholder communication. Of our top 15 shareholders, 6 would no longer be required to file under the rule change. This data cannot be replaced by hiring stock surveillance firms, which also rely on quarterly 13F data as a starting point for their research efforts. Additionally, stock surveillance firms are quite costly for small cap stocks with limited budgets and many companies like us forgo services that may be able to provide some incremental visibility. As such, we ask that the SEC withdraw this proposal given that knowledge of share ownership is essential for effective shareholder outreach.

Sincerely,  
Barbara G. Bolens



Executive Vice President and Chief Strategy Officer  
Enerpac Tool Group