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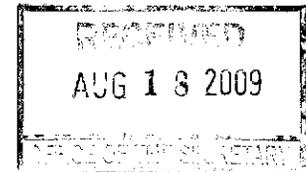
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August 11, 2009

United States Secretary Elizabeth Murphy
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: File No. S7-10-09
Release No. 34-60089
Facilitating Shareholder Director Nominations



Dear Secretary Murphy:

As a provider of comprehensive import/export services and having operated in the Port of Baltimore for more than seventy five years, I write you today to express my sincere concern over the aforementioned proposed rule change that could adversely affect my family's company should we ever have the opportunity to take it public. These proposals would directly impact on our efforts and as a result, I am writing to let you know about the reasons I do not think these proposed rules would be good for my ability to grow my business and compete.

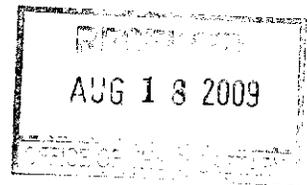
I think we all recognize that in these tough economic times, our country's regulatory bodies should maintain a strong presence in the oversight of publicly traded companies, yet due to the same economic issues, we need to be able to walk a tightrope allowing for the sort of innovation and leniency in corporate governance which enable my company to continue to grow. With a recent spate of legislation from Capitol Hill, including Sarbanes Oxley, and who knows what more, any further regulation of corporate governance severely harms our ability to grow and borrow to the degree we need for future considerations. In these times, these actions could crush us and other businesses of our size as we seek to continue growth.

The real problem I have is that the proposed rules would enable shareholders, with small stakes in a company, to foul the election process of corporate directors. Rules now allow boards the ability to balance the goals of management and shareholders. The new proxy rules don't address the current duties and legal requirements presently

MVision.

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applied by boards of directors and their nominating committees. The independence and experience of board members and nominees should be the criteria upon which they are selected and serve, not their association with shareholders.

Our current policies and rules for selecting directors have worked well, and I hope that they will remain in place for my efforts to continue growing. I see no need to enact the proposed rules. Please vote against the proposed rule changes.

Sincerely,

MERCHANTS TERMINAL CORPORATION

Harry D. Halpert
President