

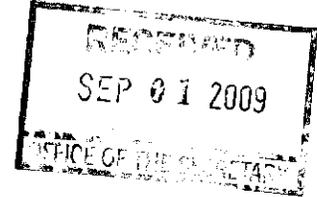


# Brigham and Associates, LLC

Registered Investment Advisor

August 26, 2009

Ms. Elizabeth M. Murphy, Secretary  
Securities and Exchange Commission  
100F Street, NE  
Washington, D.C. 20549-1090



Re: S7-10-09 (Proposed New "Proxy Access" Rule)

Dear Ms. Murphy:

***I am writing in support*** of the proposed "proxy access rule" about which I read in today's Wall Street Journal.

I believe the new rule would do much to improve corporate governance and to hold boards of directors more accountable to the shareholders. I have believed the current proxy rules serve to insulate and protect entrenched managements at the expense of shareholders. The new rule is long overdue.

It will be especially effective in the governance of small public companies which is my interest. I have attempted to solicit proxies in-order to get an alternative board member elected. However, current rules made that nearly impossible. Management never is willing to provide a shareholder list in the first place. Then, the dissident person or group is forced to put up an entire slate of directors rather than seeking only to elect one or two directors to supplement the directors nominated by management. The cost of the entire matter is born by the dissident shareholders while management uses the funds of the company to support their nominees. The proposed rule would not appear to materially increase costs to the company.

As a separate matter, I would encourage the Commission to seek ways to decrease the costs associated with being a public company. These costs are huge for companies with sales under \$500 million. In fact, these costs make it practically prohibitive for many small companies who need capital to go the public route. Also, costs of remaining public are also huge. I know this may require legislation.

Yours truly, *David E. Brigham*

David E. Brigham, CEO

Office: 6220 Los Altos Drive El Paso, TX 79912	Email Address: david@brighaminvestments.com Tel.: 915-845-5155	Mailing Address: P.O. Box 220932 El Paso, TX 79913
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