
M E M O R A N D U M

To : Commission File No. S7-10-09

**From : Lillian Brown
Senior Special Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission**

**Re : Facilitating Shareholder Director Nominations
Release No. 34-60089**

Date : November 19, 2009

On November 10, 2009, Meredith Cross, Brian Breheny, Tamara Brightwell, and Lillian Brown of the Division of Corporation Finance met with Shawn Johnson, Chairman of SSGA's Investment Committee, concerning the Commission's June 10, 2009 proposals concerning shareholder nominations to company boards of directors.