



September 15, 2009

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

Re: Proxy Disclosure and Solicitation Enhancements
File Number S7-13-09
Release Nos. 33-9052; IC-28817

Dear Ms. Murphy:

I am submitting comments on behalf of The Forum for Women Entrepreneurs & Executives (www.fweande.org) based in the San Francisco Bay area of California. Our organization is a member of ION (www.ionwomen.org) and we are supporting the comment letter sent by Jilaine Bauer on behalf of ION on September 8, 2009.

The Forum for Women Entrepreneurs & Executives (FWE&E) is the definitive community in the Bay Area for accomplished women thought-leaders, decision-makers, and influencers. FWE&E connects over 450 exceptional women leaders with people and ideas that enhance their impact on the world. For women who have achieved professional success, FWE&E expands horizons and perspectives by facilitating collaboration and fostering deep connections among members.

Part of our mission is to provide advocacy regarding the state of women on Boards and in the C Suite in the State of California. Each year we partner with UC Davis Graduate School of Management to complete a Census of Women Leaders. For complete details, the full study, and an executive summary of our past census reports, please see www.gsm.ucdavis.edu/census. The results over the past four years show little change with only 12% of Board and C Suite positions in the state of California being filled by women.

We feel strongly that it is part of our mission to educate corporations, Board nominating Chairs, and women leaders of the importance of diversity and also to provide tools and awareness regarding how to change this picture.

For this reason we believe, in general, that the changes to enhance disclosure about directors and nominees for directors are an important and helpful step forward in providing investors with information they need in making investment decisions and proxy voting decisions relating to corporate governance and the election of directors. We support these changes. However, we strongly recommend an addition to the proposal regarding whether and how board nominating committees take issues of diversity into account in making recommendations for new

board members. We also strongly recommend that biographical information provided about directors and nominees include their gender identity.

Diversity, including gender diversity, in a board is an important factor in good governance. Research shows that diversity enhances decision making. Research on gender diversity also shows that companies with diverse boards - and gender diverse boards, in particular – enjoy better financial performance and are more attendant to audit and risk oversight.

While we support this effort by the SEC to advance good corporate governance and increased transparency, the proposed set of additional disclosures should include disclosures relating to gender identity of board members and nominees and board diversity practices and policies. We do not, however, favor regulations that prescribe particular experience or functional expertise because we believe boards are in the best position to determine their individual needs and it could have the unintended effect of discouraging boards from considering the fullest possible range of talents and abilities.

Sincerely,

Wendy Beecham
CEO
Forum for Women Entrepreneurs & Executives