



The Forum of Executive Women

*Leveraging the power
of executive women*

September 15, 2009

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Elizabeth M. Murphy
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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 of Executive Women, a membership organization of more than 300 women of influence in the Greater Philadelphia region with our members holding top positions in every major segment of the community. As the region's premier women's organization, we actively work to promote our mission to leverage the power of executive women in our region to expand the impact and influence of women leaders.

We believe that enhancing disclosure about directors and nominees for directors is 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. In general, we support these changes. However, we are focusing our comments on the Commission's request for comments on whether there is a need to require additional or different disclosure related to board diversity. 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.

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, board diversity policies and goals and actions taken by the board to satisfy the policies and achieve these goals.

Sincerely,

Ellen Toplin

ET/jbp