



October 21, 2010

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE Washington, DC 20549

Dear Ms. Murphy,

Re: Concept Release on the U.S. Proxy System, File No. S71410

We welcome the opportunity to comment on the proposed rule changes to the proxy voting system made by the Securities and Exchange Commission (the "Commission") in its July 14, 2010 Concept Release regarding an analysis of the U.S. proxy system.

We commend the Commission for its efforts to address these issues. We believe that the public policy for shareholder communications and proxy is best served when the system for ownership, shareholder communications and voting are transparent.

We are also of the view that introducing transparency and competitive forces to such a critical part of our corporate environment is positive for issuers and investors alike.

Once again, I would like to thank the Commission for the opportunity to comment on its Concept Release on the U.S. Proxy System, and look forward to the Commission's rule-making to improve the efficiency, transparency, and accuracy of the System.

Sincerely,

A handwritten signature in cursive script that reads "Allison D. Kiene".

Allison D. Kiene