



Principal Financial Group, Inc.

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October 20, 2010

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

RE File S7-14-10

Dear Ms. Murphy,

I wish to thank the Commission members for allowing the Principal Financial Group (The Principal) to comment on your concept release on the U.S. proxy system. We are very appreciative of Chairman Schapiro's efforts and look forward to improvements in the proxy mechanics so that all issuers are allowed a more effective and cost efficient process.

Founded in 1879, the Principal is a leader in offering businesses, individuals and institutional clients with a wide range of financial products and services. In 2001, The Principal demutualized and became a publically traded company. Our organization currently has over 400,000 registered shareholders. Hence, we care deeply about being able to effectively communicate in a cost efficient manner with all of our valued stakeholders.

The following are comments in regards to specific sections of the Commission's concept release.

- We support the concept of requiring brokers to reconcile their positions on the proxy record date, thereby allowing borrowers and lenders to accurately vote their share ownership positions.
- We support the concept of allowing a fair and competitive market to determine the appropriate fees for proxy distribution. The inability to negotiate fees and clearly understand how such fees were determined has proved frustrating.
- We support the concept of allowing issuers the choice of selecting in a competitive environment a vendor to create a unique proxy card and distribute annual meeting materials to "all" shareholders.
- We support the concept that the current fee structure discourages issuers from communicating with beneficial shareholders.
- We support eliminating barriers between public companies and their beneficial owners who hold shares in 'street name'. This would allow issuers to more effectively communicate with these stakeholders. Beneficial owners who wish to remain anonymous should be allowed to register their shares in a nominee or custodial account with their bank or broker.

- We support the concept of improving the methods associated with educating investors.
- We support the concept of eliminating the voting instruction form (VIF) and having all shareholders utilize a legal proxy card. The current VIF format is unclear and could be significantly improved to promote investor participation.

Thank you again for providing this opportunity to publicly comment on improving the mechanics of the U.S. proxy system.

Thank you.

Sincerely,



Timothy E. Dohlman
The Principal Financial Group
Assistant Director – Stockholder Services
Des Moines, Iowa