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Office of the General Council

September 7, 2007

Mr. Christopher Cox, Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Dear Commissioner Cox:

The Adrian Dominicans Sisters, a community of vowed religious women based in Michigan, has a commitment of nearly forty years to socially responsible investing. We have used our assets to advocate on issues of peace, economic justice, environmental degradation and human rights. Thus it deeply concerns us that the Securities and Exchange Commission is considering proposals that could destroy or cripple our right to file non-binding shareholder resolutions with corporations. For over three and a half decades, shareholder proposals have provided large and small shareholders with a voice in the governance of corporations on which their financial futures depend. Doing away with the ability to file proposals would be a setback for shareholder democracy and corporate governance more generally.

Shareholder resolutions seek greater accountability and transparency from corporations. For example, it was shareholder initiatives that prompted many corporations to realize the lack of diversity on their corporate boards and its significance in strengthening their corporate position in today's multi-ethnic reality. Climate change is another example. Many corporations are beginning to recognize the importance of attending to the impact of climate change in order to position themselves to be better prepared to avoid the costs associated with climate change and to adjust to new business opportunities.

We view the role of engaged shareholders as an integral part in an ongoing dialogue relative to the role of corporations in the global economy. We oppose any opportunity for companies to opt-out of the shareholder resolution process, the substitution of an electronic forum for the shareholder resolution process and any increase in the resubmission thresholds from the current 3%, 6% and 10%.

In conclusion, we urge the SEC to take no action on the current proposals that would limit or end shareholder resolution initiatives. There is no documented problem that would justify such extreme restrictions on shareholder rights. Thank you for this opportunity to comment.

Sincerely,

Sister Donna Markham, OP
Prioress

Sister Rosa Monique Peña
Vicaress

Sister Mary Kay Homan, OP
General Councilor

Sister Kathleen Nolan, OP
General Councilor

Sister Judith Rimbey, OP
Administrator / Councilor