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WILLIAM C. THOMPSON, JR.
COMPTROLLER

October 6, 2009

Elizabeth M. Murphy, Secretary
U. S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: File Number S7-18-09;
Political Contributions by Certain Investment Advisers

Dear Ms. Murphy:

As New York City's Chief Fiscal Officer and the Chief Investment Adviser to the New York City Pension Funds, which manage over \$95 billion on behalf of New York City employees and retirees, I write to express my strong support for the proposed rule referenced above.

After the Securities and Exchange Commission (SEC) and New York State Attorney General filed a complaint and indictment, respectively, against Henry Morris and David Loglisci this past March, I promptly recommended to the New York City Pension Funds that they suspend investing in any firms using placement agents, firms or middlemen to obtain private equity investments with the Funds. The Trustees of all the Funds unanimously accepted my recommendation, and such a suspension has been in place since then.

In addition, I wrote to Chairman Schapiro in May 2009 urging her to take the necessary steps to promulgate appropriate uniform regulations regarding the use of such agents. I also requested that the SEC expeditiously promulgate a prohibition on investment advisors providing compensated services to public pension funds if the adviser or certain related parties make any contributions to affected elected officials or candidates.

I thank Chairman Schapiro and the SEC for acting so promptly in addressing these nationwide concerns and drafting regulations that will prohibit the use of placement agents for purposes of

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introducing or obtaining access to public pension funds and inappropriate “pay-to-play” practices. I fully support the promulgation of these regulations, which will undoubtedly increase transparency and public confidence in the investment activities of all public pension funds.

Once again, I appreciate Chairman Schapiro’s and the SEC’s efforts in addressing these critical issues.

Very truly yours,

A handwritten signature in black ink that reads "William C. Thompson, Jr." The signature is written in a cursive style with a large initial 'W' and a prominent 'C'.

William C. Thompson, Jr.

WCT/lf