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November 19, 2019

Via e-mail at rule-comments@sec.gov
The Honorable Jay Clayton, Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: File No. S7-22-19
Release No. 34-87457
Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice

Dear Chairman Clayton:

I am writing to request the comment period on the proposed rule to increase regulation on proxy advisors be extended from 60 to 120 days. The rule directly impacts the work Segal Marco provides to clients on proxy voting execution and imposes an unreasonable burden on firms like ours that provide these valuable services to their clients.

To provide us sufficient time to examine 141 pages of proposed rulemaking and respond to the many questions posed, please consider an extension to the requested 120 days.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen O'Brien", written in a cursive style.

Maureen O'Brien
Vice President, Corporate Governance Director
Segal Marco Advisors