

Via Hand Delivery

November 22, 2019

The Honorable Jay Clayton  
Chairman  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549

**Re: File Nos. S7-22-19 & S7-23-19**

Dear Mr. Chairman:

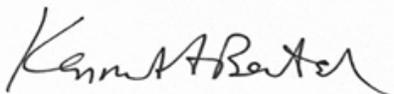
The undersigned investors and investor organizations wish to add their names to the 75 that in a November 15 letter requested an extension of the comment period from 60 to 120 days for the proposals entitled “Amendments to Exemptions from the Proxy Voting Rules for Proxy Voting Advice” and “Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8.”

The two concurrent proposed rules individually and collectively, if adopted, would result in the most significant changes to the voting rights of shareowners in decades. The proposals are complex, a combined 320 pages in length, and include 345 individual questions for commentators. The proposals explicitly and repeatedly request that commentators provide supporting “data.” To the extent possible, we intend to be responsive to this request in comment letters.

The proposed concurrent 60-day comment period for the proposals will include at least three public holidays depending upon when the proposals are published in the federal register. Thus, the proposed concurrent comment period is effectively much shorter than 60 days.

For the benefit of investors, issuers, other market participants, the Securities and Exchange Commission, and the capital markets generally, we respectfully request that you extend the comment period from 60 to 120 days for the aforementioned proposals.

Sincerely,



Kenneth A. Bertsch  
Executive Director  
Council of Institutional Investors

Betty T. Yee  
California State Controller  
State of California

Ash Williams  
Executive Director & Chief Investment  
Officer  
Florida State Board of Administration

Mansco Perry III  
Executive Director and Chief Investment  
Officer  
Minnesota State Board of Investment

Michael J. Nehf  
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State Teachers Retirement System of Ohio

Joe Torsella  
Treasurer of Pennsylvania  
Commonwealth of Pennsylvania

Jeff Davis  
Executive Director  
Seattle City Employees' Retirement System

Dieter Waizenegger  
Executive Director  
CtW Investment Group

Andrew Shapiro  
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Lawndale Capital Management, LLC

Sandra Carlisle  
Senior Responsible Investment Specialist  
HSBC Global Asset Management (USA)  
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Molly Betournay  
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Clean Yield Asset Management

Mary Beth Gallagher  
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Sister Darlene Jacobs, M.M  
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Joseph Walker  
Senior Vice President, Treasurer  
Providence St. Joseph Health

Cindy Bohlen  
Chief Mindfulness Officer  
Riverwater Partners

Cathy Rowan  
Director, Socially Responsible Investments  
Trinity Health

Rev. Bryan V. Pham, S.J., J.D., Ph.D.  
Provincial's Delegate  
USA West Province of the Society of Jesus

CC: The Honorable Robert J. Jackson, Jr., Commissioner  
The Honorable Allison Herren Lee, Commissioner  
The Honorable Hester M. Peirce, Commissioner  
The Honorable Elad L. Roisman, Commissioner  
Dalia Osman Blass, Director, Division of Investment Management  
William H. Hinman, Director, Division of Corporation Finance  
Rick Fleming, Investor Advocate