



School Sisters of Notre Dame

345 Belden Hill Road  
Wilton, CT 06897

November 19, 2019

Hon. Jay Clayton Chairman  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

Re: S7-23-19 Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8  
S7-22-19: Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice

Dear Chairman Clayton,

I write to request an extension of the comment period regarding

1) Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8 and 2) S7-22-19: Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice from 60 days to 120 days. For me, the suggested changes are very troubling because they will significantly limit my access to companies. I have been representing my religious congregation, an institutional investor with limited resources, in dialogues and with resolutions for at least 12 years.

The short window of time for comments is particularly difficult given the length of the document and the coming holiday season. For these reasons, I respectfully request an extension of the comment period from 60 days to 120.

Sincerely,

A handwritten signature in blue ink that reads "Ethel Howley, SSND".

Ethel Howley, SSND  
Social Responsibility Resource Person