



**MARYKNOLL FATHERS AND BROTHERS**

**Rev. Joseph P. La Mar, M.M.**

PO Box 305 – Maryknoll, New York 10545-0305 – Tel. 914-941-7636 ext. 2516

– Fax 914-944-3601 – Cell: 516-435-5128

Email: [jlamar@maryknoll.org](mailto:jlamar@maryknoll.org)

Corporate Social Responsibility

November 12, 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.

I am one person in my organization that is charged with following up on matters involving the SEC, such as is my concern with this letter. In order to adjust/plan/and respond to your suggestions for procedural change in submitting proxy statements; I am not alone in this predicament, the need for more review time is a necessity.

Given the complexity of the combined 320 pages of proposed changes, and the potential magnitude of such changes to an effective process that has been in place for decades, the 60-day comment period is far too short. This short window is particularly difficult given the coming holiday season. For these reasons, we respectfully request an extension of the comment period to 120 days.

Sincerely,

Rev. Joseph P. La Mar, M.M.

Assistant CFO

Copy to ICCR