

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: File Number S7-22-19

December 23, 2019

Dear Ms. Countryman:

Thank you for pursuing reforms with regard to proxy advisory firms. I think having the rules codified more concisely will benefit investors at all levels.

It is tempting as an investor who has other things on my mind to set my investments on autopilot and essentially ignore them until retirement. The danger in this is that no one cares about my investments and future the way I do. I started investing at age 13 under the guidance of my father. One of the key lessons he taught me was that being hands-off over the course of my career would hurt no one but me. Still, even those of us paying close attention to our investments over the years have had little control over the direction of a portfolio once proxy firms get their recommendations going and steer investments in certain directions. As an individual investor, I simply cannot compete with them.

I appreciate that the proposed rules spell out that the advice from proxy advisors constitutes solicitation and brings that advice under greater scrutiny and regulation for the protection of investors. My investments now have a chance.

Thank you,

Edward DiFiglia