

Suanne Estatico
[REDACTED]

January 8, 2020

Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street NE Washington, DC 20549-0609
File Number S7-22-19

Dear Ms. Countryman:

Last year when the SEC announced a plan to scrutinize and restructure the proxy advisory system, I wrote in support of standards that would create more transparency surrounding these firms.

I would like to further encourage the SEC to adopt standards that would hold these firms to a higher standard of fiduciary integrity in interacting with public and private pension investments.

As a public school teacher, my retirement security depends on the strength and performance of the Pennsylvania Public School Employees Retirement System (PSERS). I am not personally wealthy, nor is my family. As a result, I will rely heavily upon my pension in my retirement years.

I am growing concerned about the influence of the proxy firms on the future of pension funds like PSERS. My understanding is that these firms make recommendations to our fund managers that are often accepted with no questions asked, a practice called "robo voting." Yet questions must be asked to determine the motivation for certain recommendations and whether automatic voting will produce greater returns for a pension fund.

These proxy firms are not selected by pensioners or by working public employees. In fact, I believe that with Glass Lewis and Institutional Shareholder Services controlling 97% of the proxy advisory market, even our fund managers have little choice in the selection of proxy advisors.

With no regulations controlling the scope of proxy firms' involvement in our pension funds, these firms have taken on a greater role than they ought to have. And still they have no fiduciary duty to those of us invested in the funds they direct.

I am asking the SEC to enact new regulations to make sure there are clear, elevated standards and more transparency in the proxy system. The marketplace would greatly benefit if it were clear that decisions made on behalf of public pensions are made with the pensioners' best interests in mind.

As someone who will rely on a public pension when I retire, I want PSERS fund managers to invest wisely to guarantee a healthy pension fund. That means their decisions need to be based on growing the fund, and any other party with an influence on the direction of PSERS ought to have the same requirement.

It is vital for the SEC to hold proxy advisory firms to the standards of a fiduciary to ensure those relying on public pensions have peace of mind knowing they will receive what they worked for their entire life.

Thank you for once again allowing me to share my views.

Sincerely,

A handwritten signature in black ink, appearing to read "Suanne Estatico". The signature is fluid and cursive, with a long horizontal stroke at the end.

Suanne Estatico