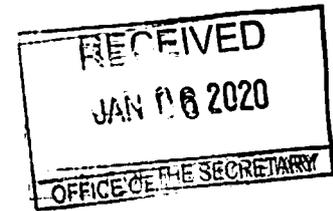


Vanessa Countryman, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609



**Re: File Number S7-22-19**

December 26, 2019

Dear Ms. Countryman:

I believe firmly in transparency in investing. Proxy firms advising pension and investment fund managers should be required to disclose any conflicts of interest so that fund managers can make informed decisions regarding the financial prudence of guidance they receive from proxy firms.

In my career I have contributed to a defined contribution retirement plan and a 401(a) plan. Of course, the variety of investment plans on the market does not mitigate the influence of proxy firms on them. A proxy firm has the unchecked authority to advise fund fiduciaries along political lines, appealing to the perceived social responsibility sense of large corporate clients at the expense of the individuals who are investing in those funds. Fund managers have a fiduciary responsibility to manage funds for the greatest financial gain for investors; social agendas are not part of this responsibility, or ought not be part of this responsibility.

When a proxy firm has made recommendations to satisfy the social agenda of corporate clients and fund managers automatically vote for all of these recommendations (robo-voting), real problems arise. Not only does this mean fiduciaries are abdicating their responsibility to investors, it means investor voices are essentially disenfranchised from the process.

Neither of these scenarios should be acceptable and I hope the new rules addressing the proxy process will rectify these problems.

Sincerely,

A handwritten signature in black ink, appearing to read "Brett Beaubien". The signature is stylized and written in a cursive-like font.

Brett Beaubien  
Providence, Rhode Island