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January 28, 2020

Ms. Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

RE: File Number S7-22-19

Dear Secretary Countryman:

The Longview Chamber of Commerce is a voluntary organization of business and professional leaders who have joined together for the betterment of business, development of tourism, development of downtown Longview potential, and the overall quality of life in Longview. This letter is intended for the SEC docket file related to the proxy advisory process, which we believe requires greater oversight.

As a business organization, we support only the most legitimate, ethical, and transparent business practices. The proxy advisory practice leaves much to be desired in this regard. It is not hyperbole to suggest that the system is being abused by individuals and firms that should only be committed to their fiduciary duties to investors. They have consistently pursued their own ideological objectives at the direct expense of investors.

We are particularly troubled by dubious methods such as automatic voting, which was highlighted in the proposed rule by the SEC. In the currently unregulated space, proxy firms have failed to disclose conflicts of interest or really anything about how decisions are made and why. The only consideration should be the financial wellbeing of their clients.

Proxy advisory firms also leverage so-called environmental, social, and governance (ESG) strategies that have been proven to deliver lower returns. This preference for ESG investing undermines the financial security of countless small-business owners and the public servants our communities rely on. This has had an unwarranted impact on many industries that are well regulated but subject to scrutiny from activists. It has impeded normal corporate governance.

We support the Commission's efforts to review the proxy advisory process. We encourage the actions taken so far to curb the industry's abuses, including the finding that proxy advice is a solicitation, and we encourage further reform.

Best Regards,

A handwritten signature in black ink that reads 'Kelly R. Hall'.

Kelly Hall, CCE IOM MSL
President/CEO

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