



Ball Corporation
2111 Wilson Blvd., Suite 900
Arlington, VA 22201

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

Re: Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice
Release No. 34-87457; File Number S7-22-19

Dear Ms. Countryman,

Ball Corporation is the world's largest manufacturer of innovative, sustainable aluminum packaging solutions for beverage, personal care and household product customers, as well as aerospace and other technologies and services primarily for the U.S. government. Ball Corporation and its subsidiaries employ 17,500 people worldwide and reported 2018 sales of \$11.6 billion.

We appreciate the opportunity to provide comments on the proposed rules issued by the Securities and Exchange Commission (SEC) on November 5, 2019 entitled Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice. Ball Corporation supports SEC efforts to enhance the accuracy, transparency, and completeness of the information used to inform voting recommendations provided to clients of proxy voting advice businesses. We also support amendments to improve disclosure of conflicts of interest that may have a material impact on voting recommendations.

Rules 14a-2(b)(1) and Rule 14A-2(b)(3) Conflicts of Interest. To ensure transparency and fairness to the company this is subject to the report, proxy advisors should fully disclose any generic or inherent conflicts of interest specifically within their proxy voting reports and also on their proxy advisor websites.

Rule 14a-2(b)(9)(ii) Review of Proxy Voting Advice by Registrants and Other Soliciting Persons. Adequate time, at least five business days, is needed to review and provide feedback on the recommendations made by a proxy advisor before dissemination to their clients.

Rule 14a-9 False or Misleading Statements. Having context for voting recommendations made by proxy advisors is critically important to ensure fairness and transparency to companies, investors and shareholders. Disclosure of a proxy advisors business

methodology, sources of information and material conflicts of interest disclosures should be required.

Disabling of pre-populated and automatic voting mechanism. Investors should consciously focus and decide on the key issues presented on the proxy statement. Therefore, the SEC should require proxy advisors to disable pre-populated voting mechanisms and the automated submission of votes.

Thank you again for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink that reads "John D. Campbell". The signature is written in a cursive style with a large, stylized initial "J" and "C".

John D. Campbell
Vice President, Government Relations