



Subject line: Re: Comments on Proposed Rule: Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice

Release No. 34-87457; File No. S7-22-19

On behalf of Felician Sisters of North America, I am writing to oppose the proposed rule.

Investor Advocates for Social Justice (IASJ) votes our proxies. We do not have the resources within our institution to vote proxies with the same skill, expertise, and efficiency. The proposed rule would take away our ability to have IASJ vote proxies on our behalf in a way that is consistent with our investment priorities and values. As a religious institution, we are concerned that our ability to have a voice in the corporate governance of our portfolio companies and the economy would be limited by this rulemaking.

I support the comment submitted by Investor Advocates for Social Justice regarding the threat to their ability to vote proxies on our behalf under the proposed rule.

Thank you for your consideration of this correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "S. P. Bannon", with a long horizontal line extending to the right.

Sean P. Bannon, CFO  
Felician Sisters of North America