



November 12, 2019

Hon. Jay Clayton
Chairman
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: S7-23-19 Procedural Requirements and Resubmission Thresholds under Exchange Act Rule
14a-8
S7-22-19: Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice

Dear Chairman Clayton,

I write to request an extension of the comment period regarding 1) Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8 and 2) S7-22-19: Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice from 60 days to 120 days.

Given the complexity of the combined 320 pages of proposed changes, and the potential magnitude of such changes to an effective process that has been in place for decades, the 60 day comment period is far too short. This short window is particularly difficult given the coming holiday season. For these reasons, we respectfully request an extension of the comment period to 120 days.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, likely representing the name Josh Zinner.

Josh Zinner
CEO
Interfaith Center on Corporate Responsibility