

MARYKNOLL SISTERS OF ST. DOMINIC, INC.
TREASURY, P.O. BOX 310
MARYKNOLL, NY 10545-0310

TEL: [REDACTED]

FAX: [REDACTED]

November 13, 2019

The Honorable Jay Clayton, Chairman
Securities and Exchange Commission
100 F Street NE
Washington, DC 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 am writing to respectfully request an extension of the comment period regarding the following:

- 1) Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8
- 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. We, as a Congregation who count on our investments to assist us in our ministries and the retirement needs of our Sisters, need more time to review the proposed changes. In addition, the short timeframe is particularly difficult given the coming holiday season. For these reasons, I respectfully request an extension of the comment period to 120 days.

Sincerely,



Sister Darlene Jacobs
Treasurer