

ActionAid International USA
Amnesty International
American Jewish World Service
Bank Information Center
CARE USA
Catholic Relief Services
Columban Center for Advocacy and Outreach
CorpWatch
Crude Accountability
EarthRights International
EARTHWORKS
Environmental Defense Fund
EG Justice
Environmental Defense
Friends of the Earth
Gender Action
Global Financial Integrity
Global Rights
Global Witness
Government Accountability Project
Human Rights Watch
International Budget Project
International Labor Rights Forum
Justice in Nigeria Now
Maryknoll Office for Global Concerns
Micah Challenge USA
Natural Resource Governance Institute
Open Society Policy Center
Oxfam America
Pacific Environment
Presbyterian Church USA
Project on Government Oversight
Robert F. Kennedy Center for Human Rights
Sustainable Energy & Economy Network
The Borgen Project
The ONE Campaign
United Methodist General Board of Church and Society
United Steelworkers
United to End Genocide

February 28, 2020

Vanessa A. Countryman
Secretary, Securities and Exchange Commission
100 F Street NE, Washington, DC 20549-1090

RE: Request for Extension of Deadlines for Comments on Proposed Rule Requiring Disclosure of Payments by Resource Extraction Issuers, File No. S7-24-19

Dear Secretary Countryman:

On behalf of the Publish What You Pay United States, a coalition made up of 39 anti-corruption, financial transparency, anti-poverty, tax justice, faith-based and human rights organizations, I am writing to request an extension of the comment period for the proposed rule File Number S7-24-19 to implement Section 1504 of the Dodd-Frank Act.

We appreciate the opportunity to comment on this proposed rule and plan to do so. However, the current deadline does not provide sufficient time for commenters to best respond to the extensive questions in the proposed rule. In order to allow investors, civil society organizations, citizen groups and other interested parties to adequately provide the information sought by the Commission to inform the final rule, we request a 30-day extension of the comment deadline, and the addition of a 3-week period for reply comments. Our requested deadline for initial comments would be April 16, 2020, with reply comments due by May 8, 2020.

The extension we request is justified for several reasons. First, the deadline does not allow sufficient time to provide thorough comments given the complexity and scope of the changes presented in the proposed rule as compared to the 2016 rule. The proposed rule reverses course on virtually every major feature of the rule and would diverge significantly from the international standard under which hundreds of companies are already publicly reporting. Such substantial reversals from the Commission's prior findings, and the degree of divergence from existing regimes in other markets, will have sweeping consequences for global transparency and requires thorough and comprehensive analysis. Additionally, the proposed rule includes 98 questions and additional sub-questions, many of which are quite complicated and require new research.

Second, the use of the Congressional Review Act (CRA) to vacate the Commission's 2016 rule poses important and novel legal questions. The Commission must ensure it strikes an appropriate balance between the vote of disapproval under the CRA and the original Congressional mandate outlined in Section 1504. The Commission's interpretation will require significant legal consideration and interested parties need sufficient time to provide informed legal analysis.

Finally, the international context has changed in considerable ways since the 2016 rule. The passage of disclosure laws in other countries has led to four years of subsequent reporting in other markets providing critical data that must be considered by the Commission. In fact, over \$800 billion in payments made to 152 countries have been disclosed by roughly 850 public, private and state-owned companies. The proposed rule fails to adequately reflect these new market realities in the economic analysis. Thus, commenters like PWYP-US must expend significant time and resources to engage in this necessary analysis.

We appreciate the considerable work the Commission has undertaken in drafting the proposed rule and want to ensure that stakeholders have adequate time to review and analyze the proposed regulations to understand the new requirements and provide comments to inform the drafting of a final rule. Therefore, we respectfully urge that the Commission extend the deadline for initial comments by 30 days, to April 16, 2020 and give the public an additional three weeks to provide reply comments.

Should you have any questions on this request please contact me at . Thank you very much for your timely consideration of this request.

Sincerely,



Kathleen Brophy
Director
Publish What You Pay – United States