



December 4, 2019

Commissioners
Securities and Exchange Commission,
c/o Brent J. Fields, Secretary,
Securities and Exchange Commission,
100 F Street, NE,
Washington, DC 20549-1090

File Number S7-25-18

Dear Commissioners,

On behalf of more than 500,000 members and supporters of Public Citizen, we ask the Securities and Exchange Commission (SEC) to extend the comment deadline for its “list of rules to be reviewed pursuant to the Regulatory Flexibility Act.” The current comment period is 30 days.

According to the release, the purpose of this exercise is “to determine whether such rules should be continued without change, or should be amended or rescinded.”

In all, there are nearly 40 rules at issue. Alone, this is a formidable number. Some of these rules involve major issues, and the underlying rulemaking documents may span hundreds of pages. For example, the rule regarding “Executive Compensation and Related Person Disclosure” absorbs 436 pages.¹ Providing thoughtful comment on this issue alone, when the SEC contemplates rescinding this rule altogether, merits far more than a 30 day comment period. Comment on even a subset of these rules also warrants more than 30 days.

We ask that the SEC establish at least a 90 day comment period.

For questions, please contact Bartlett Naylor at [REDACTED],

Sincerely,

Public Citizen

¹ *Executive Compensation and Related Person Disclosure*, SECURITIES AND EXCHANGE COMMISSION (August 29, 2006) <https://www.sec.gov/rules/final/2006/33-8732a.pdf>