

03/01/11

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission (SEC)
100 F Street, NE
Washington, DC 20549-1090

RE: Comments Regarding File Number S7-40-10 on Conflict Minerals

Dear Ms. Murphy:

I am writing to urge you to institute robust and comprehensive rules on conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

I represent Hoover & Strong Inc. We are concerned that mining of gold and other metals comes at a great cost to communities and the environment, particularly in areas of armed or militarized conflict. We strongly support the development of supply chain transparency that will provide independent verification that a company is not sourcing gold that is financing armed conflict and human rights violations.

I believe that these rules have the potential to help make that verification possible if they are stringent on several important points

To meet statutory intent and requirements and the needs of companies and investors seeking to avoid implication in conflict and human rights abuses, the rules must fully include gold and metals mining companies. Gold is an important component of conflict financing that the rules must fully account for. Mining companies have previously been involved in supporting armed groups in the DRC and the rules must require disclosure to help prevent that from happening again.

The rules must be firm and comprehensive. Companies should “file” not just “furnish” conflict minerals disclosure, and that disclosure must include strong due diligence and evidence and identification of all known countries of origin and actual specific origin of minerals, if known, for the DRC. The rules should also interpret manufacturing inclusively, and ensure that the rules cover any products in which conflict minerals are intentionally added or are essential to the product’s use, purpose, or marketability, or products the production of which requires conflict minerals.

Thank you for the opportunity to comment on these important provisions.

Sincerely,

Stewart Grice
Mill Products Director
Hoover & Strong Inc.
Richmond VA 23236.