

The Honorable Mary L. Schapiro
Chairman
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

May 4, 2011

Dear Chairman Schapiro:

The University of Notre Dame mission statement affirms that its guiding aim is to “create a sense of human solidarity and concern for the common good that will bear fruit as learning becomes service to justice.”

The issue of the conflict minerals trade and its relationship to extreme violence in the Democratic Republic of the Congo is of critical importance in the context of this mission statement, and so this letter is to express support for your efforts, and those of the Securities and Exchange Commission, to fully implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) in File S7-40-10, 75 Fed. Reg. 80948 (Dec. 23, 2010).

This important initiative will help to ensure that investors and consumers alike can access the information necessary to effectively participate in the global marketplace based upon the financial and moral dimensions of economic decisions that have the potential to curb the illicit trade in conflict minerals.

Please find below several recommendations for your consideration as you prepare the final rules as prescribed by the Dodd-Frank Act.

First, companies should be mandated to comply with all reporting requisites immediately upon the release of the final rules. Any delay in compliance amounts to an extension of the horrific human rights abuses that have occurred as a result of trafficking in conflict minerals.

It is critical to note that corporate supply chain transparency lies at the core of this legislation, and the SEC should provide specific guidelines with regard to the requirements for determining whether or not supply chains can be linked to exacerbating the violence in the Democratic Republic of the Congo.

Furthermore, companies who seek a “DRC Conflict Free” label or its equivalent ought to have met a high threshold of proof, and the substantiating evidence should be made available to the public. Many students of conscience would be willing to pay a higher price for a verifiably conflict-free product.

As a final recommendation, it is essential that the rules be comprehensive in their applicability to all conflict minerals including, but not limited to, gold, tin, tantalum, and tungsten.

In closing, thank you for your attention to this urgent issue. The war in the Democratic Republic of the Congo has become the deadliest since World War II, and the Securities and Exchange Commission should use all possible means at its disposal to enable consumers to leverage their purchasing power to bring the shocking violence in this region of Africa to an end.

This is not only an issue of corporate responsibility, but a fundamental call to our conscience as a nation.

Sincerely,

Patrick McCormick
Student Body President
University of Notre Dame