

December 16, 2010

Mary L Schapiro
Chairman
Securities and Exchange Commission (SEC)
100 F Street, NE
Washington, DC 20549

Re: Proposed Rule on the Dodd-Frank Act – Special Disclosures Section 1502
(Conflict Minerals)

Dear Chairman Shapiro:

On behalf of the undersigned associations, we are writing to request an extension of the comment period for the proposed rule on Section 1502 of the Dodd-Frank Act. The current deadline of January 31, 2011 does not provide sufficient time for companies, particularly small and medium enterprises, to collect the information necessary to comment on all of the areas listed in the Federal Register notice. The notice requests substantial input from industry, which we would like to provide. To accommodate the process, we request a 30-day extension of the comment period.

We appreciate the considerable work the Securities and Exchange Commission (SEC) has completed in drafting the proposed rule and believe stakeholders need adequate time to review, evaluate, and assess the proposed regulation to understand the new requirements and the impact on global supply chains. We request the extension for two reasons in particular.

First, given the complexity of the changes required, many companies do not believe the current deadline provides sufficient time to provide meaningful and complete comments to the SEC. The proposed rule applies to a large universe of companies and industries; companies cannot implement the new requirements without engaging in significant consultations and agreements with suppliers, distributors, metal refiners, and mineral traders throughout their global supply chains. As these entities are located all around the world, more time is needed to work with supply chain partners to discuss the proposed rule and its implications. Companies potentially have to make significant changes not only to internal compliance programs, but also to entire manufacturing and ordering processes and global supply chains.

Second, a third of the comment period corresponds with a time of the year when many companies are closed for the holiday season or employees are out of the office on leave. Without adequate time to review the proposed rule and provide comments, the regulation could have a significant negative impact on economic competitiveness and employment.

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We respectfully urge, therefore, that the deadline for comments be extended 30 days to March 2, 2011. A 30-day extension should provide interested parties with ample time to provide full and complete comments to the SEC. We cannot underscore enough the significance of this rule-making and the need to take a measured and balanced approach. We appreciate your consideration of this request.

Sincerely,

[Advanced Medical Technology Association \(AdvaMed\)](#)
[Aerospace Industries Association \(AIA\)](#)
[American Association of Exporters and Importers \(AAEI\)](#)
[American Automotive Policy Council \(AAPC\)](#)
[Business Alliance for Customs Modernization \(BACM\)](#)
[IPC - Association Connecting Electronics Industries](#)
[Joint Industry Group \(JIG\)](#)
[National Association of Manufacturers \(NAM\)](#)
[National Electrical Manufacturers Association \(NEMA\)](#)
[National Foreign Trade Council \(NFTC\)](#)
[National Retail Federation \(NRF\)](#)
[Retail Industry Leaders Association \(RILA\)](#)
[Semiconductor Equipment and Materials International \(SEMI\)](#)
[TechAmerica](#)
[USA*ENGAGE](#)
[U.S. Chamber](#)

cc: The Honorable Michael Froman, Deputy National Security Adviser for
International Economic Affairs
The Honorable Robert Hormats, Under Secretary of State for Economic, Energy
and Agricultural Affairs
The Honorable Francisco Sanchez, Under Secretary of Commerce for
International Trade