To whom it may concern:

I am writing regarding the proposed changes to the reporting standards of entities filing pursuant to the Securities Exchange Act of 1934, Sections 13(a) and 15(d). Specifically, I am submitting comments regarding the implementation of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act which addresses conflict minerals.

Regarding the proposed rules, I respectfully ask that the following comments (in response to the questions outlined in File No. S7-40-10) be considered (the numbers correspond to the question number):

1. All designated conflict minerals in Section 1502(e)(4) of the Act should be subject to the same reporting standards. Due to the fact that all of these minerals are found in the region in question and each holds the potential to contribute to the ongoing conflict, it stands to reason that they should all be subject to the same reporting standards. The argument that one mineral contributes less (to the conflict) than others to the conflict is irrelevant—if a mineral contributes at all, it is contributing too much.

2, 3. All manufacturers that make use of the minerals in question should be required to report the minerals' origins, and whether or not the products made from them are "DRC Conflict-Free". It is imperative that the broadest definition possible for 'person described' be incorporated into the rules so that the intent of the legislation may be carried out—that the contribution of conflict minerals to the atrocities occurring in the Democratic Republic of the Congo be minimized, so far as is possible. Bear in mind that the decision of who is required to report will have an enormous impact on the people living in this region of the Congo. This decision represents a chance to do what is right for these people.

4, 5. The rules, as has been proposed, should apply to foreign private issuers. It is necessary that all entities be subject to the same rules so that the intent of the law may be carried out. In addition, this prevents foreign entities from acquiring an unfair business advantage over domestic ones.

Similarly, small companies should not be exempt from the final rules.

6, 7. In the interest of carrying out the intent of the law (the minimizing of the contribution of conflict mineral trade to conflict in the Congo), the final rules should require all companies making use of the specific minerals to disclose their origin and issue a report, if necessary.

In addition to the fact that the law would be more effective in its purpose, the inclusion of entities that do not file reports under the Exchange Act would prevent an unfair advantage being given to those entities (with respect to entities that do file reports).

8. As previously stated, in the interest of carrying out the intent of the law, all entities should be bound by the final rules.

9, 10, 11, 12. Regarding the issue of who is a manufacturer, it is my opinion that anyone involved in the process of changing a product containing one of the minerals in question (including the minerals themselves) from one form to another is to be considered a manufacturer, and should be bound by the rules. This would mean that contract manufacturers and manufacturers of generic goods would be required to follow the final rules and file reports regarding the origin of the minerals they used. Retailers who contract these manufacturers should not have an unfair advantage in marketing their products which would be the case if contract manufacturers were exempt from the rules.

16, 17, 18, 19, 20, 21. The phrase "necessary to the functionality or production of a product" should be taken to mean that one of the minerals in question was deliberately added to the product during production. It is not required that the mineral be necessary to the products functionality—the word 'or' separates the two qualifications (necessary to functionality and necessary to production), meaning that if it is used in production, it is subject to the rules. Additionally, if the mineral is used in production, it is necessary to production, as determined by the manufacturer's use of the mineral. Therefore, if it is used in production, it should be bound by the rules.

27, 28. Issuers should be required to describe the method they used to ensure that their minerals do not come from the DRC. Otherwise, there is no point to the rules. Disclosers could easily lie without this element of accountability. The discloser should also keep these records on file for a sufficiently long period of time, for the same reason. This extra paperwork is very little burden to store.

31, 32. In the interest of transparency, the audit report should appear on the issuer's website. The Conflict Minerals Report should be handled the same way. The information should be available online for a sufficiently long period of time.

37. Products making use of these minerals that used minerals whose origin cannot be determined should not be allowed the label "DRC conflict free" as this would be misleading consumers. An alternative label that clearly states that the minerals are of unknown origin would be appropriate.

38. If a product cannot be certified as DRC conflict free, it should not bear that label, as this would mislead the consumer and undermine the effectiveness of the law. If the products contain minerals from the DRC conflict region, it would not be unreasonable to require them to be labeled as such, so that the consumer may be informed. This would aid in carrying out the intent of the law—preventing conflict minerals from perpetuating conflict in the Congo.

39. In the interest of transparency, all conflict minerals should have reported the facilities, countries of origin, and efforts to determine where the minerals were mined. If this is only done for minerals that do not meet DRC conflict free standards, there is no real transparency. Disclosing this information for all minerals will create a transparent, verifiable and accountable system.

40. Issuers should give as much information as possible regarding the location of the mines for the reasons stated above—disclosing this information for all minerals will create a transparent, verifiable and accountable system.

41. Information on dates and shipment weight from mines should be included. This is a valuable resource in holding the issuer accountable and preventing fraud.

42, 43. Regarding audit certification, the rules should take a strong stance in favor of this mechanism. Independent, third-party certification is imperative if accountability and transparency are to be maintained. It must be verified that entities are complying with the law. Without these audit certifications being strong, the law will not be effective. Therefore, they should be, in all ways possible, strong and effective.

50. If a product is to be certified DRC conflict free, the minerals it contains must not come from the mines in question. Therefore, if a product is to bear that label, due diligence must be used in supply chain audits, that the public will not be misled.

51, 52, 53, 54, 55. Regarding mechanics of the rules, the finalized versions should reflect what is best for the people of Congo. The finalized rules should represent what is best for these people, not what is best for industry representatives. It would probably be good to prescribe specific effective methods of due diligence. The due diligence methods used should be internationally recognized and accepted.

58. While small companies have argued that they will be hurt if they are made to comply with these regulations on schedule, a delay would only cause more suffering in the Congo. We must ask ourselves, what is more important—people or business?

62. There should be no minimum threshold. If a conflict mineral is used by an entity, it should be required to report it.

64, 65. Reasonable inquiry and due diligence should be utilized in determining whether a mineral is of scrap/recycled origin, so that an issuer cannot use this as a way to use unreported minerals from the DRC that are not recycled.

68. While small companies have argued that they will be hurt if they are made to comply with these regulations on schedule, a delay would only cause more suffering in the Congo. We must ask ourselves, what is more important—people or business?

Thank you for your consideration. I hope that the SEC's rules will reflect the United States' role as leader of the free world—that is, I hope to see rules which promote freedom from tyranny and oppression in the Congo. I hope that the SEC will implement rules which effectively halt the contribution of conflict mineral trade to the ongoing violence in the Congo.

Thank you once again,

Jeffrey Trott