

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

7 January 2011

Dear Ms. Murphy

Re: File Numbers: S7-40-10, S7-42-10 and S7-41-10

On behalf of the World Gold Council (WGC) and its member companies, we kindly request a 30 day extension of the comment period for the proposed rules related to the implementation of Sections 1502, 1503, and 1504 of the Dodd-Frank Act (the "Proposed Rules").

The World Gold Council (WGC) is the market development organisation for the gold industry. The organization represents the world's leading gold mining companies, who produce approximately 60% of global corporate gold mining production. Working within the investment, jewellery and technology sectors, its purpose is to provide industry leadership, whilst stimulating and sustaining demand for gold.

We appreciate the opportunity to comment on the Proposed Rules and we intend to do so. We have already begun the process of coordinating a response on behalf of the WGC and have been advised by our member companies that they are currently undertaking comprehensive reviews of the Proposed Rules in order to determine their comments as well.

There are several reasons why the current January 31, 2011 deadline does not provide sufficient time for us to respond effectively to the Proposed Rules. First, the Proposed Rules are complex and contain many provisions which could have significant consequences for the gold mining industry. The SEC has asked for feedback on a wide range of questions and we wish to consider the issues carefully.

Second, the Proposed Rule relating to Conflict Minerals (Section 1502 of the Dodd-Frank Act) proposes to deem gold mining companies "manufacturers" of conflict minerals. This proposed provision was, in our view, unexpected and requires a thorough examination of the potential consequences of such a designation, both within the context of the Proposed Rules and elsewhere.

Finally, from a practical perspective, the Proposed Rules were released during a very busy time of year for the WGC's member companies. We believe that these Proposed Rules need to be carefully evaluated by the appropriate persons in order for informed comments to be provided to the SEC. As such, more time is required to ensure that this can take place. We believe that rushing to provide comments without considered discussion among the industry would serve no one's interests.

We therefore request that the deadline for comments be extended 30 days to March 2, 2011. Please feel free to contact either of us at the given address if you have any questions about this request. Thank you for your timely consideration of this matter.

Yours sincerely



Ian Telfer
Chairman



Aram Shishmanian
Chief Executive Officer