



March 2, 2011

Via E-Mail

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

Re: SEC Proposed Rule on Disclosure of Payments by Resource Extraction Issuers (File Number S7-40-10; 75 Fed. Reg. 80978)

Dear Ms. Murphy:

The North American Metals Council (NAMC) is pleased to submit this letter in support of the comments the National Mining Association (NMA) put forward on the December 23, 2010, U.S. Securities and Exchange Commission (SEC) proposed rule on Disclosure of Payments by Resource Extraction Issuers to implement Section 1504 of the Dodd-Frank Act.

NAMC is an unincorporated, not-for-profit group of metals-producing and metals-using associations and companies. Some NAMC members are involved in mining and as such, have a vested interest in these proposed implementation regulations.

NAMC supports the comments and positions the NMA put forward. In particular, we support the NMA's views that the proposed regulations should be focused on upstream, pre-smelting, pre-refinery sectors, which are directly related to the process of extraction and production of minerals. NAMC also supports the positions the NMA put forward to reduce potential economic and resource burdens.

Thank you for the opportunity to provide this feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Roberts", is written over a light-colored background.

Kathleen M. Roberts
NAMC Executive Director