

Subject: SR-NASDAQ-2020-081

From: Barb Smoot

Affiliation:

Dec. 21, 2020

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Dear Ms. Countryman:

One of our company/organization's core values is a commitment to increasing diversity and inclusion. Diverse is invaluable to an organization. We believe it is critical to support companies and organizations who share our core values/mission. Accordingly, we offer our support for the Nasdaq's new proposed rules for the following reasons.

We believe that Nasdaq's diversity proposal is in the public's interest and will enhance corporate governance, board decision-making, investor protections and investor confidence.

We acknowledge Nasdaq in recognizing that there is no one-size-fits-all approach to board diversity. We believe that the flexibility that Nasdaq is giving to companies to explain why they do not meet the minimum objective of two diverse directors is reasonable.

We commend Nasdaq for providing companies with the opportunity to increase board diversity through a disclosure-based, business-driven approach rather than a quota. We do not believe Nasdaq's requirements will be overly burdensome or coercive.

We recognize that implementing Nasdaq's changes may take time. Therefore, we applaud Nasdaq for implementing a phase-in period for companies to adhere to the new listing standards.

We believe that Nasdaq's proposed definition of diversity will improve transparency and comparability of disclosures across companies, whereas a broader definition would maintain the status quo of inconsistent, noncomparable data.

We believe Nasdaq's proposal will help make meaningful progress in improving board diversity related to race, ethnicity, sexual orientation and gender identity.

We are encouraged that Nasdaq's proposal will lead to more of our members, most of whom are highly qualified and distinguished in their fields, getting appointments on corporate boards.

Respectfully submitted,

Barb Smoot

Barb Smoot
President & CEO, Women for Economic and Leadership Development

[REDACTED]

[REDACTED]

(Attached File #1:srnasdaq2020081-8172827-227019.png)(Attached File #2:srnasdaq2020081-8172826-227019.png)
(Attached File #3:srnasdaq2020081-8172829-227019.png)

[REDACTED]