



January 4, 2021

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

RE: PROPOSED SR-NASDAQ-2020-081

Dear Secretary Countryman:

The Minority Corporate Counsel Association (MCCA) appreciates an opportunity to comment on Nasdaq's proposed rule requiring disclosure regarding board diversity. The MCCA is a national organization made up of leading general counsel and is the preeminent voice on diversity, equity and inclusion in the legal industry. It was founded in 1997 to advocate for the hiring, retention and promotion of diverse attorneys in corporate law departments and law firms that serve them. Today, MCCA furthers its mission through research and training.

We commend Nasdaq for calling attention to the importance of achieving greater diversity at the highest levels in corporate America. This proposed rule change acknowledges the value of having a diverse, equitable and inclusive workplace. We believe the proposed rule will encourage corporations to be more proactive in achieving board diversity. We need leaders to stand up and be bold if we are going to achieve more than the status quo and disclosure is the first step. MCCA wholeheartedly supports and encourages efforts to increase diversity.

Again, thank you for the opportunity to submit this comment.

Best regards,

A handwritten signature in black ink, appearing to read 'Jean Lee', written in a cursive style.

Jean Lee
President & Chief Executive Officer
MCCA