

To : SEC

Re: Supporting the Amendment to SEC NYSE Rule 452 - Eliminate Broker Discretionary Voting.

In order To Eliminate Broker Discretionary Voting for the Election of Directors

I urge you to Support the Amendment to SEC NYSE Rule 452,
Which will Codify Two Previously
Published Interpretations That Do Not Permit Broker Discretionary
Votes for Material Amendments to Investment Advisory Contracts

It is absolutely absurd to have ever assigned Brokers Discretionary Voting for the Election of Directors to begin with **for several reasons, starting with these :**

1. Principle of stock ownership, right to self-determination.
 - a. Shareholders should always be asked to vote the shares they own.
 - i. Brokers do NOT actually own the shares they are voting, the shareholders do.
2. Brokers have Conflict of Interest
 - a. Brokers will almost necessarily vote FOR the incumbent board and FOR existing management , because it is in the brokers economic interest to do so.
 - i. To vote AGAINST the incumbent board would send the message to the broker's clients that they where incompetent in their initial recommendation to purchase that companies shares.
 - b. This broker conflict of interest leads to Broker's nearly always casting their vote for the existing incumbents regardless of their incompetency or competency.

Why this is urgent - shareholder meetings are generally **annual** events and the speed of business and money is much faster than that now, so delay on this issue will cause future business to potentially be misguided at least another year.

I support the Amendment to SEC NYSE Rule 452 - Eliminate Broker Discretionary Voting.

God speed.

- Marc