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June 3, 2010

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

Re: Proposed Exchange and FINRA Circuit Breaker Rules
File No. SR-NYSE-2010-39
File No. SR-NASDAQ-2010-061
File No. SR-NSX-2010-05
File No. SR-NYSEAmex-2010-46
File No. SR-NYSEArca-2010-41
File No. SR-BATS-2010-014
File No. SR-CBOE-2010-047
File No. SR-EDGA-2010-01
File No. SR-EDGX-2010-01
File No. SR-FINRA-2010-025
File No. SR-ISE-2010-48
File No. SR-BX-2010-037

Dear Ms. Murphy:

This letter is submitted on behalf of Accenture plc ("**Accenture**"), a publicly traded company which lists its shares on the New York Stock Exchange. Accenture appreciates the opportunity to comment on the proposals of the twelve national securities exchanges and the Financial Industry Regulatory Authority, Inc. ("**FINRA**") to adopt rules to provide trading pauses for individual stocks that are a component of the S&P 500 Index when the price of any such stock moves 10 percent or more.[1]

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[1] The rules have been proposed by the New York Stock Exchange, NASDAQ Stock Market LLC, BATS Exchange, EDGA Exchange, EDGX Exchange, NASDAQ OMX BX, International Securities Exchange, NYSE Amex, NYSE Arca, Chicago Stock Exchange, National Stock Exchange, Chicago Board Options Exchange and the Financial Industry Regulatory Authority. Securities Exchange Act Releases Nos. 62121, 62122, 62123, 62124, 62125, 62126, 62127, 62128, 62129, 62130, 62131, 62132 and 62133.

We support the Securities and Exchange Commission's ("**SEC**") response to the trading events of May 6, 2010, including its review of the volatile trading that occurred and the joint efforts of the SEC and the Commodity Futures Trading Commission ("**CFTC**"), particularly given the role that certain securities futures contracts appear to have played in that day's volatility. We also support the SEC's coordination of proposed rules by the national securities exchanges and FINRA to implement uniform, market-wide circuit breakers that would trigger a trading pause when the price of a stock included in the S&P 500 Index moves 10 percent or more within a five-minute period.

We believe that market-wide circuit breakers are an appropriate response to the trading activity of May 6, and we urge the SEC and the exchanges to extend these circuit breakers immediately to a much broader range of stocks. The stocks of a number of other companies, including Accenture, experienced severely aberrational trading on May 6 but are not in the S&P 500. While the S&P 500 may be a convenient group of stocks for use in the initial pilot, this index fails to include other stocks with comparable trading patterns and issuers who have comparable financial strength. Moreover, the May 6 experience has clearly demonstrated that gaps in liquidity that cause aberrational prices are not limited to S&P 500 stocks.

We urge that the pilot be expanded immediately to include these comparable companies. We are deeply concerned that if another trading event like May 6 were to occur and these stocks' prices again experienced aberrational fluctuations, investors could conclude that the stocks themselves were somehow at fault rather than the system in which they are traded. This would be particularly true if trading halts prevented other comparable companies from suffering similar irrational pricing.

We recognize that, for administrative convenience, selection of a broader index for expansion of the pilot may be expeditious. Nonetheless, we believe that a broad range of companies – both large, actively traded and small, less actively traded companies – need protection from collapses in liquidity. Thus, the SEC accenture

ultimately should expand the coverage of the trading halt provisions to include a broad range of companies.

We urge the SEC to continue to work with the CFTC to fully identify the causes of the trading problems of May 6 and to fully address the problems experienced by our stock and the stocks of many other issuers. As the SEC and CFTC continue their investigation, the agencies should consider whether a futures-style limit down would better respond to the problems that caused aberrant trading on May 6. Specifically, if the most extreme prices on May 6 were caused by momentary – millisecond long – gaps in liquidity, prohibiting trading below a certain level in every stock would prevent the aberrant trade in the first instance.

Thank you for considering our comments. We would be happy to discuss our concerns or any other matters that you believe would be helpful. Please contact Julie Sweet, General Counsel, at (917) 452-0097.

Sincerely yours,

Julie Sweet

cc: The Honorable Mary L. Schapiro, Chairman
The Honorable Kathleen L. Casey, Commissioner
The Honorable Elisse B. Walter, Commissioner
The Honorable Luis A. Aguilar, Commissioner
The Honorable Troy A. Paredes, Commissioner
Mr. Robert Cook, Director, Division of Trading & Markets