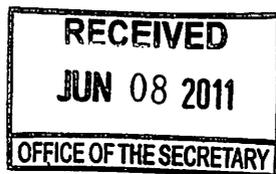


Subject: File No. SR-NYSE-2011-20

Dated: June 7, 2011



601 Moorefield Park Drive
Richmond, VA 23236-3654

Tel (804) 327 3400
Fax (804) 272 6325

www.PrecisionIR.com

To Whom It May Concern:

PrecisionIR objects to the proposed Rule 907.

For 22 years, PrecisionIR has provided investor marketing and communications services to publicly-listed companies in North America and Europe. We have vigorously competed on a level playing field, and in doing so we have continually innovated and brought new products to the market for the benefit of our clients. The recently proposed Rule 907, if enacted, would essentially eliminate our ability to compete for business from NYSE Euronext-listed companies.

The proposed rule discourages companies from hiring independent investor relations firms by effectively adding significant incremental costs to such vendors' services. This becomes particularly acute given the dramatic reductions in investor relations budgets brought about by the recent recession. Given the choice between purchasing a free product or a superior product, most companies will purchase the free product.

In addition to eliminating, or greatly increasing the difficulty facing current vendors, this rule stands to eliminate or greatly reduce any innovative solutions surrounding the products currently covered under the ruling. The vendors chosen by the NYSE Euronext represent the largest vendors in the investor relations market, however, they do not offer the best investor relations products or the most cost-effective solutions. There are a number of other providers that offer more innovative solutions to allow investor relations departments to function more efficiently and more effectively. If this rule is enacted, these projects could be shelved, these companies out of business, and future development projects eliminated.

The anticompetitive effects of the proposed rule are exacerbated by its inclusion in the Exchange's Listed Company Manual. Including the proposed rule in the Listed Company Manual gives the appearance of an imperative requirement that listed companies use the Exchange's investor relations services, all under the apparent imprimatur of the U.S. Securities and Exchange Commission.

In summary, Rule 907 stands to adversely impact the investor relations marketplace by allowing a limited number of vendors selected by the Exchange to obtain a substantial share of consumers of potential investor relations services, to the detriment of independent vendors and to the detriment of competition in general. PrecisionIR strongly recommends the SEC vote against Rule 907 and vote in favor of fair and competitive marketplaces.

Sincerely:

A handwritten signature in black ink, appearing to read "Michael Pepe".

Michael Pepe
CEO
PrecisionIR Group



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