

By Electronic Mail (rule-comments@sec.gov)
Ms. Elizabeth M. Murphy
Securities Exchange Commission
100 F Street NE
Washington DC 20549

RE: NYSE Request for Comment on SEC File No. SR-NYSE-2013-07

Dear Ms. Murphy:

I am writing in regard to the above-referenced filing by the NYSE to amend Rule 451 concerning Transmission of Proxy Material.

Zumbbox provides an electronic document delivery service commonly referred to as Digital Mail. Our service, Digital Postal Mail (“DPM”), delivers electronic documents to consumers and businesses throughout the United States. DPM is a secure environment where consumers receive, sort and manage all of their important mail and other documents. Through our partnerships, DPM allows consumers to also manage materials that may be found in their Investor Mailbox such as Proxy Statements, Monthly Statements and Confirms. Moreover, DPM includes paperless solutions that allow an investor to receive, review and instantly vote on their proxy materials all by electronic means. Our secure Digital Mailbox can be embedded into a broker’s or financial institution’s website as an integral component of an Enhanced Broker Internet Platform (EBIP).

As a leader in building paperless solutions for consumers, we support the proposed rule change. However, it is worth noting that the past decade’s efforts by companies to provide paperless solutions for their customers have resulted in silos of documents secured by different passcodes at each website. This fragmented approach has constrained adoption and delivered an inferior solution to the consumer. The same problem exists for investors since investors often have multiple providers of investor related documents and that each provider stores the documents in an investor mailbox that is isolated from the investor’s other documents. These isolated document silos complicate and act as a barrier to a more rapid and complete adoption of paperless solutions by investors. Therefore, we believe that providing additional incentives to integrate an investor’s various document “silos” into one mailbox would provide a much stronger benefit to the investor and dramatically increase the rate of adoption of paperless solutions across the entire marketplace.

Solutions like the DPM service that we provide deliver this level of integration and also provide some unique and powerful tools that are not available through an isolated Investor Mailbox.

More specifically, DPM empowers investors to take control of all of their digital and paper communications in a single integrated environment, not just the ones related to their investment accounts. DPM collects mail from all of an investor’s various relationships (*e.g.*, banks, brokers, utilities, cable companies, etc.) and pulls them together into one place. The DPM environment can be accessed directly by the investor or, in a growing number of cases, through their broker, bank and wealth management provider websites.

Additionally, solutions such as DPM have some unique characteristics and benefits that are useful to investors, brokers, issuers and regulators. Examples of these characteristics and benefits are:

1. Faster adoption of paperless solutions. By focusing on the needs of the investor and providing an integrated solution that combines both their paperless and paper content, the investor will opt into paperless solutions more rapidly and across all of their providers, not just one document silo at a time.
2. An integrated solution is easier to manage for the investor, broker and issuer. With an integrated solution and a single interface that contains all of the investor’s documents and mail, investors have a single place to go for their documents, and brokers and issuers have one place to deliver them.
3. Better shareholder participation with Proxy Votes. Solutions like DPM offer superior capabilities when it comes to verified delivery and garnering and recording investor responses. For example, from within the

DPM service, investors are able to respond immediately to proxy materials and brokers are able to set up automated reminders for the investor and confirm that proxy materials have been reviewed and completed by an investor.

4. Greater access and more frequent review of investor materials. Because the investor is able to manage all of their documents in one place, investors are more likely to visit a fully integrated document solution such as the DPM service and are thus more likely to review all of their investor related materials. Isolated document silos with limited content and functionality are more cumbersome for the investor to visit regularly.
5. Verified Delivery. Solutions like DPM provide real-time feedback to the broker and other document sources that an investor has received and opened a document. Brokers can receive notification and track whether an investor opened an investment disclosure or regulatory notice and can send a reminder if they have not.
6. Higher levels of security than exists in the marketplace. Because DPM works with many document providers, it has unique access to verify an investor's physical address through correlating the information and addresses on other physical mail sent to the same investor. Isolated Investor Mailboxes can never achieve this kind of identity and address verification.
7. Stronger corrective processes and alerts for failed deliveries. Because the DPM service can confirm delivery of documents to an investor, the DPM service is able to issue alerts to brokers and implement corrective processes for failed deliveries.
8. Flexible adoption of paperless options. Because DPM is tightly integrated with the document print stream, it can accommodate the dual delivery of print and digital documents. Since the DPM delivers digital documents at no cost until the investor goes paperless, the system can provide an on-ramp for investors unsure about the ease and benefits of choosing the paperless option.

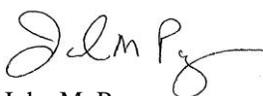
Zumbox has developed the DPM service with a keen focus on providing an effective solution for the brokerage community. Zumbox is working closely with partners such as Computershare, DST, and Broadridge to deliver digital documents to the investor from within a broker's website with minimal effort from the broker or the investor. This solution is far superior to the current approach of isolated document silos forcing an investor to jump from one document source to another.

We propose that the brokerage industry be incentivized to include a broad-based and integrated solution such as the DPM service from within the Enhanced Broker Internet Platform. The current approach of providing an Investor Mailbox was a step forward, but it is isolated and of limited benefit such that it does not attract the investor's interest or focus on the same level as an integrated solution like the DPM service. Only through providing a fully integrated solution that pulls together each silo of documents into one place will investors see sufficient benefits to opting into paperless solutions for all of their providers.

Because of the amount of documents generated by the brokerage industry, it has both the most to gain as well as the unique opportunity to lead the way towards a document delivery solution within the Enhanced Broker Internet Platform that is inclusive rather than exclusive. Furthermore, while reviewing success fees for the delivery of proxy materials is a good start, we would propose that consideration be given to providing success fees related to delivering other investor materials as well as implementing an integrated document solution that better serves the investor. Our perspective is that without an integrated document solution like DPM, many of the other investor materials, whether sent to the investor on paper or through electronic means, will continue to be left unopened and unread by the intended recipient.

Zumbox appreciates the SEC's consideration of these comments. If you have any questions related to our suggestions please do not hesitate to contact me by phone or email.

Respectfully Submitted,



John M. Payne
Chief Executive Officer
Zumbox, Inc.

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