

January 22, 2018

Office of Chief Counsel  
Division of Corporation Finance  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

**# 1 Rule 14a-8 Proposal**  
**Tekla Life Sciences Investors (HQL)**  
**Elect Each Director Annually**  
**Kenneth Steiner**

Ladies and Gentlemen:

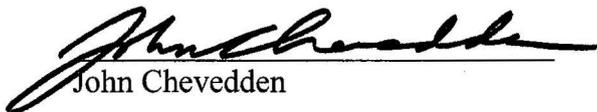
This is in regard to the January 19, 2018 no-action request.

The company appears to claim outlandishly that when there are 2 facts about one issue – previous voting outcomes on the topic of this proposal – that the company gets to boot the proponent’s fact. The company does not claim that this supporting statement is incorrect: “This proposal topic previously won our 44%-support.”

And the company does not claim that the next supporting statement is incorrect: “Shame on our management for using shareholder money to target shareholders with telephone calls telling them how to vote.”

This is to request that the Securities and Exchange Commission allow this resolution to stand and be voted upon in the 2018 proxy.

Sincerely,

  
John Chevedden

cc: Kenneth Steiner

Laura Woodward <lwoodward@teklacap.com>

[HQL: Rule 14a-8 Proposal, December 11, 2017]  
[This line and any line above it – *Not* for publication.]

**Proposal [4] – Elect Each Director Annually**

RESOLVED, shareholders ask that our Company take the steps necessary to reorganize the Board of Directors into one class with each director subject to election each year.

Arthur Levitt, former Chairman of the Securities and Exchange Commission said, “In my view it’s best for the investor if the entire board is elected once a year. Without annual election of each director shareholders have far less control over who represents them.”

A total of 79 S&P 500 and Fortune 500 companies, worth more than one trillion dollars, adopted this proposal topic since 2012. Annual elections are widely viewed as a corporate governance best practice. Annual election of each director could make our directors more accountable, and thereby contribute to improved performance and increased company value.

William Steiner’s proposal on this same topic won 78%-support at The Brink's Company.

This proposal topic previously won our 44%-support. Shame on our management for using shareholder money to target shareholders with telephone calls telling them how to vote.

Please vote to increase management accountability to shareholders:

**Elect Each Director Annually – Proposal [4]**

[The above line – *Is* for publication.]