

COMMITTEE OF CONCERNED SHAREHOLDERS

10732 Farragut Drive Culver City, California 90230-4105 Tele. & Fax. (310) 838-8105 E-Mail:
LGreenberg@ConcernedShareholders.com
www.LGEsquire.com

September 8, 2006

VIA EMAIL: Rule-Comments@SEC.gov

Ms. Nancy M. Morris
Secretary
SECURITIES AND EXCHANGE
100 F Street, NE
Washington DC 20549-1090

Re: Petition for Rulemaking
SEC File No. 4-461
Request for Further Consideration

Dear Ms. Morris:

On August 1, 2002, Mr. James McRitchie and the Committee of Concerned Shareholders, pursuant to the provisions of General Rule 192, petitioned the Securities and Exchange Commission ("SEC"), in effect, to permit corporate shareholders to nominate Director-candidates and cause the names of those candidates to appear on the corporate proxy ballot.

In view of yesterday's ruling in United States Court of Appeals for the Second Circuit and the SEC's public statement that it will, on October 18, 2006, consider the extent to which shareholders gain access to the corporate ballot, it is respectfully requested that the SEC further consider the Petition.

Please communicate with me in the event that further information is desired.

Very truly yours,

LES GREENBERG,
Chairman

LG:ms