THE SUSTAINABILITY GROUP

October 22, 2008

Florence E. Harmon, Acting Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

via e-mail to rule-comments@sec.gov

Re: File Number 4-567

Dear Ms. Harmon,

The Sustainability Group at Loring, Wolcott & Coolidge is a trust office in Boston, Massachusetts, which provides fiduciary services to families and individuals. We are committed to investing in companies that consider their social and environmental impact, as well as making a profit. As our office actively manages approximately $4.5 billion of assets, we feel that it is of utmost importance to have accurate and complete information about environmental, social and governance (ESG) performance of companies, so that we may fully assess the financial attractiveness, the quality of management and the corporate culture of our holdings.

Our office agrees with the SEC's stated intention to rethink and modernize the current disclosure system. While we recognize that much of the discussion has focused on opportunities to harness new technologies to improve reporting, transparency and the usefulness of data, we wish to highlight the SEC's statement that the "study will be a fundamental rethinking of financial disclosure, beginning with the basic purposes of disclosure from the perspective of investors and markets."

We believe that the SEC should require companies to report on ESG and sustainability issues. Companies increasingly understand that a commitment to sustainability can contribute to long-term financial success, allowing companies to reach a broader range of investors and customers, to increase operational efficiency, to improve brand positioning and potentially lead to opportunities that develop leadership in the marketplace. Over 4,600 companies issued reports on sustainability issues in 2007 and 2008 (www.corporateregister.com), including more than half of

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the global Fortune 250 (KPMG International Survey of Corporate Responsibility Reporting 2005).

The SEC should look to the Global Reporting Initiative (GRI) and its Sustainability Reporting Framework as a tangible example of a well functioning reporting system. The GRI provides guidance for organizations to use as the basis for disclosure on economic, environmental and social performance, including performance on direct economic impacts, the environment, labor practices, working conditions, human rights, society, and product responsibility. While the GRI framework does not address every issue of concern, it does facilitate transparency and accountability by companies of all sizes and sectors. More than 1,000 organizations globally declare that they use the Guidelines for their sustainability reporting, including 3M, Cisco Systems, Citigroup, Dell, Eli Lilly, Intel, General Electric, Procter & Gamble, and United Technologies. We urge the SEC to examine in depth the GRI system and explore ways in which it can be integrated into the SEC reporting requirements.

We firmly believe the time is right for the SEC to begin requiring ESG issue reporting. The metrics related to ESG information and the market's ability to quantify this data is constantly improving. If the SEC is not satisfied with the currently available frameworks and data sets, we believe that with the continual improvements in reporting criteria there will be readily available data in the near future.

Thank you for considering our comments and thoughts.

Sincerely yours,

Amy L Domini

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