

June 16, 2011

Elizabeth M. Murphy  
Secretary  
Securities and Exchange Commission  
100 F St, NE  
Washington, DC 20549-1090

**Re: Comment Request on Existing Private and Public Efforts to Educate Investors File No. 4-626**

Dear Ms. Murphy,

These comments are submitted on behalf of Labrador Regulated Information Transparency. Labrador is a private company specialized in the preparation and publication of transparent regulatory documents (10-K, Proxy etc.). Our offices in Atlanta and New York accompany corporations seeking to make their regulatory disclosure more transparent for investors and analysts.

The mandatory roll-out of XBRL is aimed to provide enhanced comparability among financial statements while improving and simplifying the way investors receive financial information. Although XBRL may be useful for analysts and institutional investors with access to sophisticated tools, it is of little help at this stage to retail investors seeking to obtain clear, understandable information on corporations.

A simple first step to more educational regulatory is twenty-first century presentation of documents published on sec.gov and in print. Technology has moved forward rapidly yet the presentation of financial disclosure remains stuck in a time warp. Advances in typesetting and document production offer possibilities to make modern disclosure more secure and less frustrating to produce, and easier to navigate for readers.

Applying the principles of information design to regulatory disclosure makes documents easier to navigate for the reader and reduces the cost of production for corporations. Importantly, these modernized documents can be produced in HTML 3.2 and are fully compatible with the EDGAR system.

The principles of information design help readers navigate through a document. When readers find the information they seek, it is important that it be written and organized in such a way as to make it understandable. Working on document drafting may be a longer process than applying the relatively simple principles of information design, but the rewards are greater still.

In 1998, the SEC published a "Plain English Handbook". It remains a useful guide for corporations to consult as they begin the noble quest towards making their disclosure more understandable for readers.

The experience of our clients has been that, by applying the principles of Plain English to their regulatory disclosure, they significantly contribute to better investor understanding of their businesses. This improved understanding manifests itself in a reduction in the number of questions asked to IR teams concerning information covered in the 10-K, and an investor sentiment that management understands its business and seeks to make it clear.

In numerous interviews, analysts have confirmed improved ease of use when working with documents that have benefited from the application of information design.

As corporations that have seen Say on Pay votes declined will attest, reduced print runs and new legislation have combined to make Proxy Statements more important than ever before. As such, forward-looking corporations are abandoning "legalese" to engage with shareholders and to increase positive voter participation. As an example, "Revocation of Proxies", which used to be common boiler-plate language, is being replaced by "How can I change my vote?".

Through applying the principles of information design and Plain English, corporations have an important role to play in securing the production of regulatory disclosure, and ensuring that it contributes to improved investor education.

We believe that further efforts should be made by corporations and their advisors to ensure that the regulatory disclosure required by current legislation be produced as a conduit to dialogue and education for investors. An updated SEC Plain English Handbook and more widely known benefits of information design principles would be useful to this effect.

We trust that these comments are both suitable and relevant, and would be delighted to discuss improved disclosure as an opportunity for investor education.

Sincerely,



Martin Bischoff  
CEO