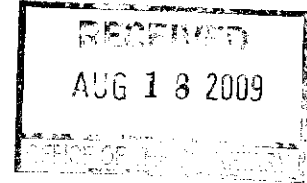




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August 17, 2009



Ms. Elizabeth M. Murphy
Secretary
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File No. S7-10-09; Release No. 34-60089 ; Facilitating Shareholder Director Nominations

Dear Ms. Murphy:

Unnecessarily long and overly politicized director elections are a serious concern for business owners who fear that the changes to proxy access currently under consideration will spawn director elections that accomplish little and misdirect the focus of their company. These fears are justified when owners consider the time these elections are likely to consume—time better spent building a more competitive business.

Owners want serious and dedicated individuals to seek positions on governance boards, but adjusting proxy access would subject these qualified persons to long proxy battles thus discouraging the likelihood that they would seek these positions in the first place. Without their participation and willingness to serve on boards, companies can't guarantee that they will have the guidance to weather this current economic storm.

From an owner's perspective, these election wars would be costly and detrimental to a company. Entertaining a host of nominees—some qualified and some not—for board positions would drain company resources and make it impossible to set standards of experience and expertise for board member positions. Of course, the prospect of untested members making important decisions puts a business at an increased risk of failure, which is another extremely important reason to oppose these changes. I urge you to reject these changes and maintain a proxy regulatory system that's fair for business owners.

Sincerely,

A. Brian Onorio
President