INSTRUMENT PIPING
IPT
TECHNOLOGIES, L.L.C.

6315 Fieldstone Drive • Baton Rouge, LA 70809
(225) 753-3521 • FAX (225) 756-0770

August 14, 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:

I support the SEC's goals of solidifying fair and supportive regulations for U.S. corporations, but in the interests of my own business and our partners, I fear that these changes would hinder corporate governance rather than improve it.

I am the President of Instrument Piping Technologies, a privately-held industrial supply company. Realistically, when taking into account the size and nature of our business, it is feasible that our company may never be taken public. However, there may indeed come a time when we feel that doing so would be ideal. Instituting these proxy access changes could not only affect such a decision in the future, but it would also directly affect our current operations with our publicly-traded partners and affiliates. The changes would institute an environment where a minority of shareholders could put their self-interest ahead of the wellbeing of the company, and as the wellbeing of our partners goes, so does our own.

As the leader of a small business, I can testify to the necessity of not only having a qualified employee and director base, but having those groups work efficiently with each other. My concern is that, with the changes the SEC proposes, the authority to regulate this efficiency will pass from the qualified management and directors to small groups of shareholders with special interests.

This may happen through several aspects, one being the nominations and elections of board members. Through these changes, shareholders would have greater control over these processes, potentially ignoring the preferred method of reviewing qualified candidates. What is the guarantee that a coalition of shareholders is capable of making a qualified nomination for board positions of one of our partner companies?

Furthermore, this concern is extended to the election process itself. With so many divided interests, these elections could become heated, politically-charged and divisive. A business of our nature cannot afford, financially or time-wise, these inefficiencies.

As you well know, corporate governance standards in this area have changed considerably since the passage of the Sarbanes-Oxley Act. Like many others, I feel that board accountability to shareholders has been much improved and the need for further mandatory proxy access simply no longer exists.

These types of corporate governance regulations have long been the province of state legislatures. This allows states to tailor their regulations to meet the unique needs of their own economic situations and businesses; for instance, Louisiana faces certain economic issues that may not face states in the West or Northeast. I do not feel that replacing this proven, working system with a federal mandate that forces everyone into the same "box" would be problematic for states, shareholders, and corporations alike. On behalf of my organization and in the interests of our partnerships, I respectfully suggest that the proposed changes be abandoned.

Regards,

Keith Kaiser
President, Instrument Piping Technologies