

August 15, 2009

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

Re:

Facilitating Shareholder Director Nominations

File No. 57-10-09 Release No. 34-60089

Dear Ms. Murphy,

This letter is presented in response to the Commission's request for comments in the release referenced above. As a small business owner, I have concerns about the proposed changes contained within the Proposed Rule.

The proposed certifications and disclosures would provide insufficient information about shareholder nominees to the nominating committee to allow the committee to make informed decisions about whether to endorse nominees for election. The consequence would only serve to discourage qualified individuals from running for board service and require almost no minimum standard for those who could be nominated.

The proposed threshold of 1% stock ownership is too low to provide reasonable assurance that nominees placed in the company's proxy will, if elected, act in a manner that is consistent with the long-term best interests of the company and its shareholders as a whole.

The Proposed Rule created an environment where confusion, costs and incompetence reign, which I am certain is not the intention of the Commission - but the unfortunate result nonetheless.

In light of these and other deficiencies, I respectfully submit that the Proposed Rule, in its current form, would fail to improve Board accountability to shareholders in any legitimate manner.

Respectfully submitted,

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