



September 14, 2009

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

Ref: File Number S7-13-09

Dear Secretary Murphy:

As President & CEO of The Prout Group, Inc., I strongly urge the U.S. Securities and Exchange Commission (SEC) to amend its Enhanced Nominating Committee Disclosure requirements to ensure corporate disclosure of the diversity and inclusion efforts of Nominating Committees of Corporate Boards.

As a retained executive search consulting firm with search practices in the diversity and governance verticals, we work with our clients in helping to bring talented women and people of color with requisite competencies as candidates for board search assignments. Our astute clients recognize the benefits arising from this expanded talent pool that brings diversity and technical competency to any board. Additionally, these clients recognize that the talent pool for boards have shrunk as fewer and fewer CEOs are taking on any added board assignments in light of the changing landscape brought on by Sarbanes Oxley legislation.

Shareholder protection is the prime objective of public company boards. There have been studies conducted by numerous groups including Catalyst and Virtcom Consulting identifying the economic benefits derived from a diverse board versus a non-diverse board. A diverse board more closely represents and brings a perspective of those shareholders and all other stakeholders including customers, employees, suppliers and communities. Our clients are aware of these economic advantages and are proud of the diversity on their boards. I am certain that they may welcome the opportunity to disclose their efforts as best practice leaders for others to follow.

Sincerely,

Patrick M. Prout  
President & CEO

