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Rolland H. Bushner
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July 25, 2010

SECURITIES & EXCHANGE COMMISSION

AUG 03 2010

OFFICE OF INVESTOR EDUCATION AND ADVOCACY

U.S. Executive and Exchange Commission
Office of Investor Education and Advocacy
100 F Street NW
Washington, DC 20549-0213

Dear Sir/Mme:

In response to a news item (NY Times, 7/15/2010, "S.E.C. Soliciting Comment On Investor Proxy Systems"), I submit the following comments:

With regard to the relationship between voting power and economic interest, it is wrong for various institutions, including brokerage firms, to be permitted to vote the proxies of those stock holders who do not choose to vote. This should be prohibited.

Furthermore, in my opinion there should be a procedure by which mutual fund investors have a right to vote proxies of companies in which the fund holds a substantial percentage of shares, say three or four percent, based on the proportionate size of the investor's holdings. To simplify matters, this could be limited to investors with sizable holdings. It is wrong to give mutual funds superior rights to individuals.

All rules concerning corporations should take account of the fact that corporations are fictitious persons, not real individuals. This is what has been overlooked in recent Supreme Court decisions.

Very truly yours,

Rolland H. Bushner

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