

April 23, 2018

Mr. Brent Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090

RE: File Number SR-IEX-2018-06
Submitted via rule-comments@sec.gov

Dear Mr. Fields,

We write to provide comments on the Securities and Exchange Commission's notice of filing of a proposed rule change to establish a new optional listing category on the exchange, "LTSE Listings on IEX," filed by the Investors Exchange, LLC.

As the directors of the Aspen Institute's Business & Society Program and the Future of Work Initiative, we believe that short-term pressures in today's capital markets can have widespread, systemic, harmful effects on the economy. In our experience, the need to address and develop solutions to short-termism has been a rare area of agreement among prominent business leaders, investors, labor, and scholars. Over many years, we have proposed business principles and policy ideas – endorsed by business, finance and labor – to rebalance the short-term/long-term focus with the goal of facilitating long-term investment in companies and their workers.

We also know that private sector-led efforts to address the challenge of corporate short-termism are essential to shifting the decision-making environment for business leaders and investors. Currently, there are few options that allow investors and companies to "vote with their feet" and operate in a long-term oriented ecosystem. To that end, we are encouraged by the proposed LTSE Listings on IEX and their focus on long-term value creation.

We appreciate the opportunity to provide comments on the Commission's proposed rule change.

Sincerely,

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