



December 22, 2020

Vanessa Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609

Re: File Number: SR-NASDAQ-2020-081

Dear Vanessa,

I am writing to you today regarding NASDAQ's recent proposal submitted to the Securities and Exchange Commission on December 1, 2020. The proposal (SR-NASDAQ-2020-081 as listed above) advocates for board diversification and disclosure. As a female-owned investment management firm and a member of the Thirty Percent Coalition, Fairpointe Capital supports diversity and inclusion and believes it is invaluable to an organization.

We feel that NASDAQ's proposal will enhance corporate governance, board decision-making and lead to efforts towards more diversification within corporate boards. We urge the SEC to consider this proposal as we firmly believe that it will benefit the public and boost investor confidence. We understand that it may take time to implement and that there needs to be some flexibility but ultimately, we see it will lead to diverse highly qualified candidates getting appointments.

Best regards,

A handwritten signature in black ink that reads "Frances E. Tuite".

Frances E. Tuite  
Partner and Portfolio Manager