

Thomas F. Kreiner Carol E. Duffy Clifford D. Lane
McKEAN COUNTY COMMISSIONERS
500 West Main Street, Smethport, PA 16749
www.mckeancountypa.org
814.887.5571

January 2, 2024

Submitted electronically via: rule-comments@sec.gov Vanessa Countryman
Secretary U.S. Securities and Exchange Commission
100 F Street NE Washington, D.C. 20549-1090

Subject: Self-Regulatory Organizations; New York Stock Exchange LLC; Notice of Filing of Proposed Rule Change to Amend the NYSE Listed Company Manual to Adopt Listing Standards for Natural Asset Companies (SEC No. SR-NYSE-2023-09)

Dear Secretary Countryman:

As Commissioner of McKean County, Pennsylvania I have reviewed the Federal Register notice containing the above referenced Proposed Rule and have concerns regarding this Proposed Rule and its stated purpose. McKean County is a rural county in Northwest Pennsylvania and includes a portion of the Allegheny National Forest. McKean County's economy greatly relies on a sustainable forest industry, oil and gas industry, agriculture, manufacturing, and tourism. The current PILT serves our region to lessen the tax burden on landowners. Any effort to reduce the Congressionally authorized uses of these lands will negatively impact the foundational industries that support our local economy.

On December 18, 2023 the Allegheny Forest Alliance (AFA) submitted comment opposing the proposed rule and provided details regarding the impact to the multiple stakeholders within our region. Northwest Pennsylvania Region includes approximately 514,000 acres of national forest and adjacent state and private lands. The AFA, a non-profit coalition of local communities and individuals support sustainable forestry, environmental stewardship and work to ensure the stability of our communities occupied by the Allegany National Forest.

In particular I would like to emphasize Duchesne County Commission of Utah and the 11 pages which they submitted on December 18th, 2023 which I believe effectively highlights many concerns of rural, agricultural counties across our Nation.

On behalf of the school districts, townships, businesses and private landowners of McKean County I oppose the rule that would allow the publicly traded class of Natural Asset Companies (NAC's).

The County encourages the SEC to immediately reconsider and abandon its proposed course of action.

Sincerely,

Carol E. Duffy

McKean County Commissioner, Vice-Chair