

Shareholder Communications Coalition
September 16, 2009

The Shareholder Communications Coalition (“Coalition”) sent a comment letter to the SEC yesterday, regarding its regulatory proposals on proxy disclosure and solicitation enhancements.

The Coalition commented on one issue in this rulemaking: the SEC’s proposal to require public companies to disclose on Form 8-K the results of a shareholder vote within four (4) business days after the end of a shareholder meeting.

While a more timely disclosure schedule for shareholder voting results is certainly an improvement, the Coalition does not believe the current proxy voting system is presently able to produce an accurate and verifiable vote count. For this reason, the Coalition urges the SEC to include any accelerated vote count disclosure requirement in its current evaluation of proxy infrastructure issues.

Click on the following link to review the Coalition’s comment letter on this subject, which includes Coalition research on proxy voting that was submitted to the SEC last month:

<http://shareholdercoalition.com/SCCProxyDisclosureCommentLetter9-15-09.pdf>

Thank you for your interest in the Shareholder Communications Coalition.

Niels Holch
Executive Director