HARRINGTON
INVESTMENTS, INC.

September 7, 2007

Christopher Cox, Chair
Securities & Exchange Commission
Attention: Nancy Morris, Secretary
100 F Street, NE
Washington, DC 20549

RE: File Number S7-16-07

Dear Mr. Cox,

Harrington Investments, Inc. (HII) currently manages approximately $200 million in individual and institutional assets, utilizing a comprehensive social and environmental, as well as financial criteria. I am writing to you on behalf of HII, as well as my advisory clients, who have retained me to manage their assets primarily because the mission of HII is to serve clients by advocating a strong social and environmental policy as an owner of publicly traded stock.

In representing owners of publicly traded corporations, I have served as an investment advisor for over 25 years, and as a professional in the socially responsible investment community for over 35 years. I advocated on behalf of shareholders in the early 1970s, introducing my first shareholder resolutions in 1974 and 1975. Since that time, I have witnessed declining SEC protection of the individual shareholder, as significant rights have slowly but surely, been whittled away, primarily as corporate management, corporate general counsels and corporate-funded state legislators have reduced shareholder rights and power while protecting a growing class of wealthy and excessively paid elite managers. The current proposals before the public are yet another attempt by the SEC to outrageously eliminate the small amount of residual power of the share owning public who rarely attempt to influence the almost insurmountable power of corporate management.

Director Nominations

Currently, it is impossible for the owners of stock in large publicly traded corporations to nominate the directors who are fiduciaries supposedly representing shareholders. Directors are self-nominated as a slate running unopposed. Corporate management is the only entity soliciting and controlling proxies. In many cases, shareholders cannot even vote "against" directors, and oftentimes can only "withhold" support, which is not a "no" vote. One vote can elect an entire slate of directors. Most corporate managers, by incorporating in Delaware, have eliminated cumulative voting, a minimal protection of

1001 2ND STREET, SUITE 325 NAPA, CALIFORNIA 94559 707-252-6166 800-788-0154 FAX 707-257-7923
HARRINV@NAPANET.NET WWW.HARRINGTONINVESTMENTS.COM

minority shareholders, allowing some representation on the board of directors. Only recently, more companies have eliminated classified voting or staggered terms for directors, utilized to protect corporate management if threatened by a buyout offer, allowing even a majority of shares to be frustrated from electing a majority of directors in any one year. Stalin would have endorsed the present "one party state" system of nominating and electing directors.

All of these protections have resulted in shareholders having virtually no rights as legal owners of publicly traded corporations. Ownership is truly separate from control and owners have given up control for liquidity. Now, the SEC is proposing that the director ballot nomination process be opened up in rare cases, where shareholders collectively owning 5% for a least a year, can actually nominate directors. Not only is this choice, no choice, it is demeaning to ordinary shareholders, institutional and individual alike. In large publicly traded corporations, not even large institutional investors own 1%, much less 5% of the outstanding shares of a company. To set a threshold of ownership so high is an insult.

Both the 5% proposal and the other SEC proposal to deny **any** director nomination process for owners should be defeated. Both proposals are clearly corporate management-sponsored and do not deserve to see the "light of day." Both proposals are intended simply to humiliate shareholders further.

"Opting Out" of Precatory Shareholder Resolutions

Adding insult to injury, this modest "suggestion" by the SEC is an obvious attempt to allow corporate management to have the ability to totally avoid shareholder "advisory" resolutions (if, in fact, shareholders can somehow avoid the SEC staff eliminating their resolutions by allowing management to omit them from the proxy materials under the ambiguous "ordinary business" rule) who are attempting to raise significant issues with corporate management. This rule would basically allow corporate management (who control the proxy and voting process) to circumvent any shareholder concerns, and eliminate advisory resolutions from the ballot entirely. God forbid that management should actually have to deal with the advisory resolutions from shareholders.

Electronic "Chat Room"

In another effort to disenfranchise legal owners and allow management to avoid face-to-face meetings with shareholders, the SEC and its staff have "suggested" that everybody "electronically dialogue." Many states already allow companies to hold their meetings on-line so that corporate management does not have to face shareholders in person. The only reason corporate management ever returns a telephone call or answers a letter from a shareholder, is because a shareholder has filed a resolution and the corporation

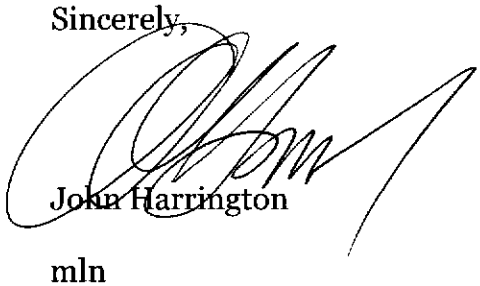
is required to do so pursuant to law. "Chatting" is just that: chatting. It is all noise and no substance. This "suggestion" should be also be ignored.

Resubmission Threshold

In a renewed attempt, and a continuation of the SEC's history of limiting shareholder rights, this "idea" calls for a larger threshold to resubmit both precatory and binding shareholder resolutions. If it wasn't demeaning and humiliating enough for owners to not be able to even nominate those with fiduciary duty over their corporations, now it will be even more difficult for owners to resubmit resolutions.

There should be no threshold for resubmission of binding or precatory shareholder resolutions whatsoever! It should not be 1%, 3% or 10% in the first year or in any other year thereafter. If, and this is more and more rare, a shareholder can get through the SEC staff and not have a resolution omitted on nebulous "ordinary business" grounds, the shareholder should have **no** resubmission restriction whatsoever. This is simply another attempt to allow corporate management to get "off the hook" and not be required to even answer to shareholders concerns. Stalin would also endorse this "idea," which obviously originated from corporate management.

Sincerely,



John Harrington

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