



UK
Social
Investment
Forum

*promoting sustainable
and responsible finance*

28 September 2007

Mr Christopher Cox, Chairman
& Ms Nancy Morris, Secretary
Securities and Exchange Commission
100 F Street NE
Washington DC 20549-1090
United States of America

Dear Commissioner Cox and Secretary Morris

**Re: Comment on Release No 34-56160; IC-27913; File No. S7-16-07 and
Release No 34-56161; IC-27914; File No S7-17-07.**

I am writing to submit comments on the above referenced Releases dealing with the shareholder resolution process and access to the proxy. My comments are made on behalf of the UK Social Investment Forum (UKSIF), the United Kingdom membership network whose mission is to promote sustainable and responsible finance, including socially responsible investment.

In their letter of comments about these releases dated 27 September 2007, our American sister organization, the Social Investment Forum, has highlighted that they believe that an investor's ability to engage with companies would be severely hampered if certain concepts raised in these SEC releases were to be implemented.

Many UKSIF members are institutional investors based in the UK with shareholdings in US listed companies. Like members of the Social Investment Forum, they take their responsibilities as owners of securities seriously including the voting of proxies and engagement with companies. With share ownership becoming increasingly international, being able to exercise effectively their responsibilities as owners of US securities is a matter of increasing concern for investors based in the UK.

UKSIF has worked closely with the Social Investment Forum for many years and has a high regard for their knowledge and expertise in supporting responsible asset ownership. We would urge you therefore to protect the interests of international owners of US securities and to pay due regard to the Social Investment Forum's well-informed comments and concerns.

Yours sincerely

Penny Shepherd MBE
Chief Executive