

State Universities Retirement System of Illinois

Serving Illinois Community Colleges and Universities

P.O. Box 2710 • Champaign, IL 61825-2710 (217) 378-8855 • (217) 378-9801 (fax)

Dan M. Slack Executive Director

Via e-mail

October 1, 2007

Nancy M. Morris Secretary Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-1090

Re: Shareholder Proposals (File Number: S7-16-07)

Dear Ms. Morris:

I am writing on behalf of the State Universities Retirement System of Illinois ("SURS"), a public pension fund of the state of Illinois serving over 180,000 participants and with assets under management of over \$16 billion. SURS appreciates the opportunity to provide comments on the Securities and Exchange Commission's ("SEC" or "Commission") proposed amendments to the rules under the Securities Exchange Act of 1934 concerning shareowner resolutions and electronic shareowner communications, as well as to the disclosure requirements of Schedule 14A and Schedule 13G ("Proposed Amendments").

For the reasons set forth and described in detail in the Council of Institutional Investors' comment letter of September 18, 2007, regarding these proposed amendments, SURS can not support the Proposed Amendments as currently drafted. We urge you to carefully consider and address the comments and concerns of the Council of Institutional Investors.

Furthermore, in light of the current vacancy on the Commission, SURS suggests that this proposal be tabled until the Commission is once again meeting with a full complement of five members.

The State Universities Retirement System of Illinois appreciates the opportunity to express its views on this matter. Please feel free to contact me with any questions.

Sincerely,

Dan M. Slack Executive Director

c: Mr. Mitchell Vogel

President, Board of Trustees