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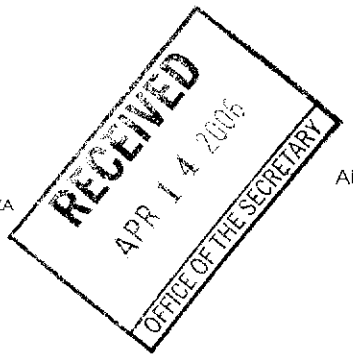

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ROBERT AGUALLO, JR.
GENERAL MANAGER

SALLY CHOI
ASSISTANT GENERAL MANAGER

April 6, 2006

Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-9303

RE: File Number S7-03-06
Executive Compensation and Related Party Disclosure

Dear Ms. Morris:

The Los Angeles City Employees' Retirement System (LACERS) administers a $9.4 billion defined benefit public pension plan serving 42,168 active and retired members and their beneficiaries. LACERS' Corporate Governance Committee strongly supports greater disclosure of Executive Compensation and the added investor protections proposed by the SEC.

LACERS believes that improving alignment of interests between shareowners and corporate management produces superior investment returns. As such, the LACERS Corporate Governance Committee focuses a high level of attention and care towards promoting sound corporate governance practices. The Committee is charged with reviewing, monitoring, discussing, and developing action-oriented recommendations focused in this arena.

The Committee believes that the Council of Institutional Investors' SEC Issues Briefing Book, dated March 30, 2006, best reflects the concerns, objectives, and solutions in this topic. The Committee strongly supports your concepts of a Compensation Discussion and Analysis, the three primary categories of tables, and the supplemental narrative disclosures.

We urge the Commission to move expeditiously to implement the new disclosure rules in time for the 2007 proxy season. If you have any questions or require additional information, please call LACERS' Chief Investment Officer Dan Gallagher at 213 473-7121.

Respectfully submitted,

Shelley I Smith.
Commissioner

Kelly Candaele
Commissioner

Robert Aguallo, Jr.
General Manager

RA:DG