87-10-09 11

Richard F. Blake 137 McGregor Ave Mount Arlington, NJ 07856 973 663 4092 blake_richardf@yahoo.com

May 26, 2009

US Securities and Exchange Commission 500 5th St. NW Washington, DC 20001

Attn. Mary L. Shapiro; Chairman

CC Kathleen L. Casey Commissioner Elisse B. Waiter Commissioner Luis A. Aquilar Commissioner VTroy A Paredes Commission

Subject:: Proposed Rule Amendments to Facilitate Rights of Shareholders to Nominate Directors

Dear Ms. Shapiro

Since most of my retirerement assets are invested in stock, and many of those have plummeted in value due to the greed and mismanagement of the Directors and CEO's, I heartily applaud your initiatives to increase the rights of shareholders to participate in the success of the Corporations they have invested in by

- 1. Permitting Stockholders to nominate Directors to be included on the Corporate Proxy Statements
- 2. Permitting Stockholders to submit resolutions to be included on the Corporate Proxy Statements.

Page 1 of 2

JUN 11 2009

As Carl Icahn has written, the odds are stacked in favor of the Board and against Stockholder initiatives to take corrective action.

In order to level the playing field, I respectfully suggest the following additional initiatives for your consideration

3. The Individual Stockholder's vote should be confidential to prevent pressure from Management to force employees and associates owning stock from undue pressure to vote for the management slate of Directors and Resolutions

4, Only proxies specifically voted by stockholders should be counted and voting of Restricted Stock and Stock held for the stockholder by others should not be automatically voted for management.

Sincerely yours

Richard Flahr

Richard F Blake