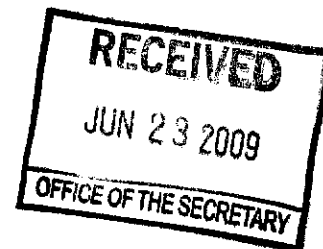


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June 15, 2009

Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: File No. S7-10-09
Facilitating Shareholder Director Nominations

Dear Ms. Murphy:

This letter is provided in response to a request for comments on the above-proposed rules. In a speech by Brian Breheny, Deputy Director of the Division of Corporation Finance, he addressed executive compensation and shareholder access. As to executive compensation, he repeated the oft expressed view that executive compensation needs to be tied to long term performance, not short term goals. Thereafter, he suggests the need for greater shareholder access which presumably will provide oversight over compensation practices by directors nominated by shareholders.

I would suggest that you review the history of proxy contests. In how many of those proxy contests has executive compensation been the issue? If the Commission is truly concerned with the long term rather than short term goals, it hardly seems appropriate to put hedge funds and "fast money" investors in the boardroom since their only objective is short term gain.

Please keep this empirical evidence in mind as you address finalizing these rules.

Sincerely,

A handwritten signature in black ink, appearing to be "Ralph Strangis".

Ralph Strangis

RS:mo
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