



Enhancing the Return on Capital
Through Increased Accountability

September 8, 2006

VIA EMAIL: Rule-Comments@SEC.gov

Ms. Nancy M. Morris, Secretary SECURITIES AND EXCHANGE 100 F Street,
NE Washington DC 20549-1090

Re: Petition for Rulemaking
SEC File No. 4-461
Request for Further Consideration

Dear Ms. Morris:

On August 1, 2002, Mr. Les Greenberg of the Committee of Concerned Shareholders and I, pursuant to the provisions of General Rule 192, petitioned the Securities and Exchange Commission ("SEC") to permit corporate shareholders to nominate director-candidates and cause the names of those candidates to appear on the corporate proxy ballot.

In view of yesterday's ruling in United States Court of Appeals for the Second Circuit and the SEC's public statement that it will, on October 18, 2006, consider the extent to which shareholders should gain access to the corporate ballot, it is respectfully requested that the SEC further consider our original petition.

Please let me know if you have any questions concerning this request.

Sincerely,

James McRitchie

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