



3
RECEIVED
MAY 20 2008
OFFICE OF THE SECRETARY

May 14, 2008

Subject: File No. 4-547, Request for Interpretive Guidance on Climate Risk Disclosure.

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

Dear Ms. Morris:

As the CEO of an investment advisory firm and a responsible fiduciary, I feel that it is important for me support the "Petition for Interpretive Guidance on Climate Risk Disclosure" filed with the Commission on September 18, 2007.

I am concerned about the risk that climate change poses to my clients' portfolios, to the broader US economy, and to civilization in general. I have found that corporate disclosure on climate risk by companies is inconsistent and many companies are failing to disclose their risks. Companies in many sectors face increasing risks from climate change and its impacts, and investors will likely be adversely affected by corporate losses in the future that are tied to climate change impacts.

The SEC currently requires companies to disclose risks that could reasonably affect their sales or revenues. However, most companies are failing to disclose their risks from climate change, even though these risks are highly likely to have a great impact.

I believe that corporations that register with the SEC should assess the regulatory, physical and litigation-related risks they face from climate change, and disclose their material risks in SEC filings. Commission guidance would be extremely helpful in providing investors this important information.

Thank you for your consideration of this critical issue. I hope my comments will be useful to the Commission and Staff in their deliberations.

Sincerely,

John Harrington
CEO

