Ursuline Sisters of Tildonk
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Bellerose, NY 11426

September 5, 2007

Christopher Cox, Chair
Commissioners
Securities and Exchange Commission
100 F Street, NE
Washington D.C, 20549-1090

File Number: S7-16-07

Dear Commissioner Cox:

I am writing in support of the SEC regulations—as currently written—which pertain to the filing of precatory shareholder resolutions. Investors are guaranteed under state law certain rights and access, which include the right to petition management, address all investors and file relevant proposals on corporate governance and societal matters. That access is regulated through the Securities and Exchange Commission, which has developed a sound, functioning system over the years from its creation.

We, the Ursuline Sisters of Tildonk-U.S. Province, as an institution hold significant numbers of stocks and bonds of U.S. and other global corporations. We strongly believe that our financial resources must be used to promote justice. Since the late 1970s, we have filed shareholder resolutions and taken part in discussions on the issues we have raised.

We know from firsthand experience that corporations influence political decisions and impact our society and our environment. We work in schools, local communities and social service agencies. We loan to organizations to build housing for low income families and help immigrants to become U.S. citizens. Anti-predatory lending, affordability of drugs, solid waste disposal, living wage and transparency of political contributions are just a few of the concerns that we have raised because of the effects,

some of them life-threatening e.g. access to affordable drugs, on us and on the people we serve.

The resolutions we file are advisory. Sometimes we are ignored. Often, management agrees to meet and progress is made. This has been true on HIV/AIDS, lending to low income census tracts for small business and affordable housing development and many environmental issues. These changes would not have occurred if we had not filed resolutions and persisted with our requests.

Managements and Boards of Directors have listened, talked with investors and voluntarily changed policies and practices. We did not have to go to Congress, state legislators or government agencies for change.

The current regulation that an investor must have owned $2,000 worth of shares for a year is reasonable. The current voting threshold for resubmitting resolutions should remain at 3% for the first year, 6% for the second and 10% for the third. Resolutions that raise social issues e.g. labeling genetically modified ingredients in food, reporting on use of depleted uranium and conservation of water resources are seldom supported by banks, insurance companies or other corporate investors. The votes are disclosed as a percentage of votes cast. A preliminary vote often is reported at the end of the annual meeting with the final results appearing in the 10Q. This is satisfactory and should be maintained. The votes should only be based on votes cast. The total number of outstanding securities, some of which may be sitting in reserve, has nothing to do with vote results.

An electronic forum as an alternative to the current precatory proposal system will exclude many investors. It is not an appropriate vehicle for investor communication or for raising concerns with management. Furthermore, it is not a technology proven to satisfy investors—or for that matter, management.

The current regulations established by the SEC should remain in force. The federal government has established oversight of corporations. The system works. To dismantle the regulatory system would serve neither corporations nor investors. The corporations operate in many states. It is not inconceivable that a state legislature would develop its own guidelines e.g. many states have passed or are considering anti-predatory lending rules, emissions standards, universal healthcare objectives.

The Ursuline Sisters of Tildonk believe it is our fiduciary duty as an investor to raise questions when a company's governance or social record is putting shareholder value in jeopardy or causing harm to society and the environment. Clearly the sponsorship of an advisory resolution is a sound, respectful way to address an issue.

The 14a-8 system for advisory resolutions established by the SEC is important and central to the U.S. system of corporate governance. To abolish the precatory resolution process to allow corporations or states

to determine individual rather than universal mechanisms will disenfranchise investors and perhaps, allow corporations to operate without regard for the global community. Managements and Boards of Directors are operating in a global environment. These individuals cannot possibly know all of the issues and all of the impacts of their decisions and company operations. Knowledgeable and vocal investors serve an important and sound business function.

Thank you for your attention.

Yours truly,

Sister Catherine Talia, OSU