



Progressive Asset Management

9814 Branchleigh Road
 Randallstown, MD 21133-2028
 410 • 655-9588
 410 • 655-7014 Fax
 E-mail: RTorgerson@progressive-asset.com

October 2, 2007

Mr. Christopher Cox
 Chairman
 Securities and Exchange Commission
 100 F Street, NE
 Washington, D.C. 20549

VIA FAX

ES 122025
 RECEIVED
 2007 OCT 23 PM 3:06
 CHAIRMAN'S
 CORRESPONDENCE UNIT

Dear Commissioner Cox:

I am writing on behalf of Progressive Asset Management, Inc. We work with a group of 65 investment professionals advising over \$1 billion of individual and institutional investors funds. We are concerned at some alarming ideas raised at the recent SEC roundtable meetings regarding shareholder resolutions, and the suggestion that the right of shareholders to sponsor advisory shareholder resolutions under Rule 14a-8 either be eliminated or further restricted.

Shareholder advocacy works to make American corporations stronger. There is a long history of positive reforms and policies resulting from shareholder resolutions with companies. The rising support votes for resolutions, across a range of environmental, social and governance topics, indicate that a broad spectrum of investors increasingly understand, and take seriously, shareholder resolutions as a means by which to stimulate changes in companies.

The SEC has issued three specific proposals which we believe would eliminate or cripple the resolution process. We cannot support the following proposals: (1) the "opt-out" option that would allow the most unresponsive companies — those with the worst records when it comes to good corporate conduct and governance — to drop out of the shareholder resolution process and isolate themselves further; (2) the unilateral substitution of the electronic petition model or "chat room" for the vibrant and public 14a-8 shareholder resolution process; and (3) the raising of shareholder resolution resubmission levels from the current 3%, 6% and 10% vote levels to 10%, 15% and 20% levels, thus effectively killing many important shareholder resolutions.

We also support the right of investors to nominate board members using the proxy process and urge the SEC to have a reasonable level of shares required for the nomination process. Under one approach raised by the SEC, such shareholder involvement would be barred outright, whereas another approach outlined by the Commission is so onerous to make such involvement all but impossible.

Finally, due to the controversial nature of these ideas, we feel it inappropriate to adopt any if these until all vacant positions on the Commission are filled. At this time, the SEC should not make any changes to shareowners' rights to file advisory resolutions.

Sincerely,

Richard W. Torgerson
 Director, Social Research &
 Shareholder Advocacy

Specializing in Socially Responsible Investing
 Securities Offered Through Financial West Group, Inc.
 Financial West Group is a NASD, SIPC, MSRB Member.