

VIA EMAIL: [rule-comments@sec.gov](mailto:rule-comments@sec.gov)

November 18, 2019

The Honorable Jay Clayton  
Chairman  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549

Dear Mr. Chairman:

**RE: FILE NOS. S7-22-19 & S7-23-19**

British Columbia Investment Management Corporation (BCI) is an investment manager with over CAD \$150 billion in assets under management, and one of the largest institutional investors in Canada.

For the benefit of all investors, issuers, and other capital market participants, BCI respectfully requests an extension of the comment period from 60 to 120 days for the proposals entitled “Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice” and “Procedural Requirements and Resubmission Threshold under Exchange Act Rule 14a-8.”

The current 60-day comment period for proposals is effectively shorter than 60 days given holidays and publishing time, limiting the ability for shareholders to properly comment on the proposals. BCI believes that the adoption of the two concurrent proposed rules would result in significant changes for investors and additional time is required to properly consider them.

As the proposals explicitly request that commentators provide supporting “data”, to the extent possible, BCI will be responsive to this request through comment letters.

Sincerely,



Daniel Garant  
Executive Vice President & Global Head  
Public Markets

cc Jennifer Coulson, VP, ESG