

October 31, 2011

Institutional Shareholder Services (ISS)
2099 Gaither Road
Rockville, MD 20850-4045

Too Whom It May Concern:

I am writing in response to the request for comments regarding the Hydraulic Fracturing Proposals (U.S.) posted on the ISS Web site (<http://issgovernance.com/policy/2012comment/FrackingProposals>). Calvert Investments, Inc. is a diversified financial services company with about \$13 billion in assets under management as of October 28, 2011, which has been a client of Institutional Shareholder Services (ISS) since 2002.

Calvert is a strong advocate for the disclosure of information regarding company policies, programs and performance indicators related to natural gas development employing well stimulation that utilizes hydraulic fracturing. We fully support the hydraulic fracturing policy proposed by ISS and are encouraged by the firm's attention to the materiality of proper disclosure and management of the risks associated with natural gas development that employs hydraulic fracturing.

The proposed policy appropriately and reasonably addresses hydraulic fracturing as an issue of concern to investors. Since 2009, Calvert has called for comprehensive disclosure of the management standards of and fracturing fluids used by companies held in the Calvert Large Cap Value Fund that employ hydraulic fracturing in their natural gas development. The proposed policy indicates an equivalent interest in adequate disclosure regarding natural gas development that employs hydraulic fracturing.

Calvert is further encouraged that the desire for greater disclosure that this ISS proposal indicates is also shared by the Shale Gas Production Subcommittee commissioned by U.S. Secretary of Energy. The subcommittee's August 18, 2011 preliminary report regarding its analysis of the measures "that can be taken to reduce the environmental impact and improve the safety of shale gas production" included the recommendation to "improve public information about shale gas operations¹." As the subcommittee's report indicates, much of the conflict that has been associated with shale gas development in the United States can be attributed to a lack of communication and transparency. Calvert believes it would be a great disservice to investors and to a country that benefits from responsible development of natural gas employing hydraulic fracturing if the progress of that development was impeded by insufficient disclosure of the policies, programs and performance metrics that govern and indicate the responsible management of natural gas operations.

¹ U.S. Department of Energy. "Shale Gas Production Subcommittee 90-Day Report." August 18, 2011. http://www.shalegas.energy.gov/resources/081111_90_day_report.pdf

Calvert appreciates the opportunity to comment on this important proposal and we look forward to the final update of the ISS policy manual. Please do not hesitate to contact us should you have questions or would like to discuss these comments.

Sincerely,



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