

1745 Copperleaf Ct
Concord, CA 94518
January 2, 2020

Via email shareholderproposals@sec.gov
U.S. Securities and Exchange Commission
Office of Chief Counsel
Division of Corporation Finance
100 F Street, NE, Washington, DC 20549-2736

Re: Shareholder Proposal to Juniper Networks 2020 Meeting

Ladies and Gentlemen:

This is to respond to the Orrick-Juniper Networks letter of December 30, 2019. My proposal does not “deal[s] with a matter relating to the company’s ordinary operations”. Particularly, my proposal does not micromanage the company.

All shareholder proposal polices are related to company’s business, but the Orrick letter’s baseless “policy = business operation and micromanagement” claim could exclude every/any proposal.

The letter also failed to demonstrate the relevance of my Juniper Networks proposal with other shareholder proposal cases cited in the letter.

Section 953(b) of the Dodd-Frank Act directed the SEC to amend Item 402 of Regulation S-K to require each company to disclose the annual total compensation of the CEO, the median of the annual total compensation of all employees (except the CEO), and the ratio of these two amounts (CEO pay ratio). What are the meaning and purpose of the Congress acts and the SEC regulations if they are excluded from corporate governance? Juniper Networks should not be allowed to make the Dodd-Frank Act and the SEC Regulation irrelevant to its executive compensation policy.

Should you have any questions, please contact me at zhao.cpri@gmail.com or 925-643-5034.

Respectfully,



Jing Zhao

Cc: Brett Cooper bcooper@orrick.com, Rob Mobassaly rmobassaly@juniper.net, Justin Ho jho@orrick.com