

#236

4-500

June 21, 2005

Mr. Jonathan Katz  
Secretary  
United States Securities and Exchange Commission  
450 5<sup>th</sup> Street, N.W.  
Washington, DC 20549



Subject: Petition for Amendment to NASD Rule 3360

Dear Mr. Katz:

I am writing to express my support to an amendment to NASD Rule 3360 of the Rules of Fair Practice of the National Association of Securities Dealers, Inc. (SEC File No. 4-500 Request for Rulemaking Regarding Member Records of "Short" Positions and Reporting and Public Dissemination of Aggregate Positions by Security) that would require NASD members to maintain a record of total "short" positions in all customer and proprietary firm accounts in all publicly traded equity securities and report this information to the NASD for public dissemination of the aggregate positions by security.

Section 15A(b)(6) of the Exchange Act requires that the rules of the NASD must be designed to "prevent fraudulent and manipulative acts and practices, promote just and equitable principles of trade,...and, in general, to protect investors and the public interest." I believe that the NASD needs the reports provided under Rule 3360 extended to all OTC equity securities to prevent manipulative short selling and the loss of confidence in the fairness and legitimacy of OTC markets.

I respectfully submit my request for this imperative amendment to the NASD Rules of Fair Practice and thank you for your careful consideration of the same.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger R. Tuttle".

Roger R. Tuttle  
Chairman of the Board of Directors  
Dyna Group International, Inc.