

Dear Ms. Countryman,

As is in my interest as a retail investor, I respectfully petition the U.S. Securities and Exchange Commission (“SEC” or “Commission”) to modify Rule 13f-1(a)(1) to shorten the Form 13F filing deadline. The SEC has full authority to make this change under 15 U.S.C. 78m(f)(1).<sup>1</sup>

Under Rule 13f-1(a)(1), the Commission has set the Form 13F filing deadline as 45 days after the end of a calendar quarter. This length of time is so protracted as to run counter to the intent of 15 U.S.C. 78m(f) as it is stated in 15 U.S.C. 78m(f)(5).<sup>2</sup> I propose the filing deadline be changed to 35 days after the end of a calendar quarter; I argue this timeframe provides an ideal balance between achieving the intent of 15 U.S.C. 78m(f) while minimizing the burden of compliance.

I appreciate the Commission’s time and consideration regarding this matter.

Kind regards,  
James Lintner

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<sup>1</sup> 15 U.S.C. 78m(f)(1) states that entities classified as institutional investment managers “shall file reports with the Commission in such form, for such periods, and at such times after the end of such periods as the Commission, by rule, may prescribe, but in no event shall such reports be filed for periods longer than one year or shorter than one quarter.”

<sup>2</sup> “In exercising its authority under this subsection, the Commission shall determine (and so state) that its action is necessary or appropriate in the public interest and for the protection of investors or to maintain fair and orderly markets or, in granting an exemption, that its action is consistent with the protection of investors and the purposes of this subsection.”