Brent J. Fields

Secretary Securities and Exchange Commission

100 F Street, N.E. Washington, DC 20549-1090

Re: Order Instituting Proceedings Regarding Investors' Exchange LLC ("IEX") Form 1 Application (Release No. 34-77406; File No. 10-222) and Notice of Proposed Commission Interpretation Regarding Automated Quotations Under Regulation NMS (Release No. 77407; File No. S7-03-16)

Thank you for allowing this opportunity to comment on the proposed implementation of a 1 ms delay allowance within Reg NMS. The entire issue with this proposal, and the original IEX exchange application, is the impact that unevenly applied speed bumps can have on the ability of some participants to capture visibly quoted liquidity. The rule proposal would be significantly more palatable were the SEC to reword it in a manner that allows symmetrical delays up to 1 ms, but bans non symmetrical delays of any type – including those that advantage an exchanges broker dealer entity. Of course, such verbiage may make it difficult for exchanges to offer algorithmic order types, which naturally enjoy a latency advantage to algorithmic offerings from any other providers.

With that in mind, I still find it surprising that the SEC would look to allow an increased delay in our markets. When the original 1 second delay was contemplated it was designed to make slow markets like the NYSE speed up or lose protected status. The current proposal incents exchanges to offer variations that have added latency, free of consequence. As Robert Greifeld's remarks at SIFMA make clear, the exchanges will be able to use this to increase the complexity of our markets, to their own advantage. Admittedly, Mr. Greifeld's demonstrate a near total lack of concern for the natural investor, and should have resulted in his board firing him. That said, the commission needs to understand that equity markets are significantly more concerned with their own financial results to the detriment of other key stakeholder in the market place. Mr. Greifeld is not alone in his visible disdain for investors, and their returns.

The commission needs to reconsider giving market places an unearned blank check, which is likely to be used to increase already inflated levels of intermediation in a naked frenzy of greed and self interest.

I would further suggest that the commission require that all market places wishing to institute a delay be forced to publish a simple language description of how the delay will make markets, in the aggregate, more fair and / or efficient. While a delay on a dark market makes sense, even a symmetrically applied delay on a lit venue is of nebulous benefit. Given the time and resources spent explaining, debating and ultimately coding to these changes, it would be nice if somebody at the various markets could at least pretend they are designed to aid natural investors in the pursuit of liquidity.

In short, speed bumps for lit markets add complexity, and reduce the likelihood of visible quotes being captured effectively. As such, market makers in derivative products – like me – who use such quotes in calculating passive orders for the options market, are likely to reduce visible size and / or widen their quotes. The overall impact on the liquidity in the options market – which is already dying thanks to HFT friendly mini batch auctions – will be harmed. All so we can placate a novelist, and his merry of band of quasi informed marketeers? I suggest the market needs better reason to take a serious step backward, and give the Bob Greifeld's of the world further excuse to harm price discovery.

Instead of this poorly designed proposal to allow for the approval of a controversial market, let's take a step back and ask why we need this delay. If we don't need it, and the markets are already foaming at the mouth to use it for harm, let's do Nancy Reagan a solid, and just say no.

Your Friend

Kevin.

Kevin J Weldon

A self interested, informed and wildly entertaining market participant and cigar aficionado