



December 17, 2015

Mr. Brent J. Fields, Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Dear Mr. Fields,

PRA Group, Inc. (NASDAQ PRAA), a specialized financial services company and global leader in acquiring nonperforming loans, strongly supports and endorses NASDAQ's petition dated December 7, 2015, requesting the U.S. Securities and Exchange Commission (the "Commission") require that all investors, including hedge funds and other entities, publicly and individually disclose their short positions, and be otherwise subject to similar public disclosure requirements imposed on individuals and entities holding long positions. Being a global financial services company, we have observed that the European Union has required this type of public disclosure of short positions for many years.

The Commission's rulemaking in this regard will provide a perfect opportunity to update its rules pursuant to Sections 929X(a) and 984(b) of the Dodd-Frank Act, in order to promote over all fairness and increase transparency in connection with this type of activity. As an issuer, we believe we are currently disadvantaged by not having access to information on short holdings of our stock. Without detail as to institutional investor holdings, our shareholder lists only reflect holdings in 'street name' rather than beneficial ownership. Therefore, as investors with short positions have become more activist in corporate governance activities, we are deprived of more accurate insight into trading activity on our stock and we are unable to communicate with short position holders during proxy season and otherwise. This makes it unlikely that we can address any issues they may have, in the same manner that we can communicate with holders of long positions.

While there are numerous additional benefits to requiring public disclosures of short positions, we believe there is no acceptable rationale for giving short positions preferential treatment over other holders of our stock. We strongly urge your favorable consideration of NASDAQ's "Petition for Rulemaking to Require Disclosure of Short Positions in Parity with Required Disclosure of Long Positions."

Thank you very much for your attention to this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "S. Fredrickson", written over a horizontal line.

Steve Fredrickson
Chairman and CEO

A handwritten signature in black ink, appearing to read "K. Stevenson", written over a horizontal line.

Kevin Stevenson
President, Interim CFO and Chief Administrative Officer