

Andrew D. Demott, Jr.
Chief Operating Officer, Chief Financial Officer & Treasurer

Superior
UNIFORM GROUP

May 27, 2016

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

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OFFICE OF THE SECRETARY

Re: File No. 4-691: Rulemaking petition to require disclosure of short positions

Dear Mr. Fields:

On behalf of Superior Uniform Group, Inc., a company listed on NASDAQ, we are writing in support of NASDAQ, Inc.'s rulemaking petition dated December 7, 2015, that asks the Securities and Exchange Commission to promulgate rules pursuant to Sections 10 and 13 of the Securities and Exchange Act of 1934 (and Section 929X of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010) to require institutional investment managers to publicly disclose their short positions.

We agree with NASDAQ, the National Investor Relations Institute (NIRI), the Biotechnology Innovation Organization, and a growing number of public companies that there is a serious gap in the regulation of short sellers related to their disclosure obligations.

Investment managers who hold long positions have been subject to quarterly Section 13(f) disclosure obligations for decades, but these investment managers are not required to disclose their short-selling activities. This lack of transparency deprives companies of insights into trading activity and limits their ability to engage with investors.

This lack of transparency also hurts retail shareholders, who typically don't have the same information resources as institutional investment managers and are more likely to be misled by misinformation about a company. If both long and short investors are required to disclose their positions on a periodic basis, all market actors, including individual investors, would have more information to help them make better informed trading decisions.

Other global markets, including the United Kingdom, France, Spain, and the European Union, have adopted rules that require institutions to report net short positions to regulators and to the public. As NASDAQ and other commenters have noted, this gap in disclosure increases the risk of short-selling abuses that are harmful to U.S. companies and investors. These abuses can drive down the value of growing companies and leave them with less capital for hiring employees, investing in R&D, or providing dividends to their shareholders.

Requiring the disclosure of short positions would help prevent market manipulation and other abusive trading practices. Transparency is the best way to combat these trading behaviors – a disclosure regime for short sellers would shine light on the motivations of short sellers and provide valuable information to issuers and other investors. A short disclosure rule would greatly help the Commission, which has limited enforcement resources, police market abuses and other fraudulent conduct.

Public disclosure of short-sale activity would help our company better analyze market movements in our securities. While we now utilize the aggregate short-sale data provided by the exchanges to evaluate the market and anticipate developments with respect to our securities, we don't know who is shorting our shares and thus are unable to engage in a dialogue with short sellers unless they choose to surface publicly.

Because short positions are not disclosed, we have no way of knowing whether a particular investor has shorted our securities. While we are willing to talk with short sellers and address their questions about our business model, we really should know before sitting down at the table with an investor if they have a position, and what the nature of their position is.

We join NASDAQ, NIRI, and other public companies in urging the SEC to take prompt action to level the playing field and adopt disclosure requirements for short sellers.

We urge the Commission to draft a rule to require investment managers to disclose their short positions. Once such a rule is proposed, institutional investors, public companies, and other market participants could offer their views on how this regulation should be revised to address any concerns while still carrying out the SEC's mission to protect investors; maintain fair, orderly, and efficient markets; and facilitate capital formation.

If you have any questions, or if we can provide any additional information that would be helpful to the Commission or its staff, please feel free to contact us.

Very truly yours,

SUPERIOR UNIFORM GROUP, INC.



Andrew D. Demott, Jr.
Chief Operating Officer, CFO & Treasurer

Cc: Hala Elsherbini, Halliburton Investor Relations