



Kate Tholking
Director of Investor Relations

January 14, 2016

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

Dear Mr. Fields,

Primoris Services Corporation (NASDAQ Global Select: PRIM), a specialty contractor focusing on energy infrastructure, strongly supports NASDAQ's petition dated December 7, 2015, requesting the U.S. Securities and Exchange Commission (the "SEC") require that all investors publicly disclose their short positions. All the reasoning that supports mandatory disclosure of long positions equally applies to short positions.

Technology today allows for efficient and low-cost position monitoring. Proving short position would not place an undue hardship on firms, and it would provide more transparency to investors. We all strive for a fair and efficient market, and giving all investors equal access to more information helps us towards that goal.

Thank you for considering this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Kate Tholking'. The signature is written over a horizontal line.

Kate Tholking
Director of Investor Relations
Primoris Services Corporation