

July 23, 2019

Ms. Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-0609

Re: File No. S7-06-19: Amendments to the Accelerated Filer and Large Accelerated Filer Definitions

Dear Ms. Countryman:

On behalf of Teligent, Inc., we are pleased to support the SEC's proposed rule to amend the definitions of "accelerated" and "large accelerated" filers. Teligent, Inc. is a specialty generic pharmaceutical company. We develop, manufacture, market, and sell generic topical, as well as branded & generic injectable pharmaceutical products in the United States and Canada. Our company went public in 1982. Given the intense competition from ex-US manufacturers, our team's ability to generate positive financial performance to drive the rapid growth of our business is a challenge. We strive to optimize the commercial viability of our in-line product portfolio in order to achieve solid business performance. Our annual revenue from previous year was under \$100 million and our public float from previous year was under \$250 million.

If we could continue to have access to the public capital markets with less financial reporting regulations, we would have more time to invest our time and efforts towards expanding our product pipeline, optimizing our product portfolio and delivering high quality and competitive generic drug products to treat both acute and chronic diseases. For instance, in 2018, we received twelve Abbreviated New Drug Application ("ANDA") approvals from the United States Food and Drug Administration and a total of thirty-one approvals from our internally developed pipeline of topical generic pharmaceutical medicine since inception.

We commend the SEC for pursuing thoughtful and targeted regulatory relief—as indicated by the proposed rule—to enable companies like ours to continue to invest heavily in generating long-term value for our shareholders and patients alike.

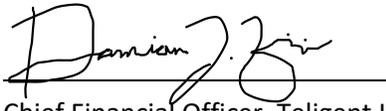
If the proposed rule is implemented in its current form, Teligent, Inc. and other small public companies will benefit from relief from Sarbanes-Oxley (SOX) 404(b), the auditor's attestation of internal controls over financial reporting and the audit fees that go with this attestation, until the company exceeds the \$100 million annual revenue cap and \$700 million in public float. The certainty and predictability provided by the proposed rule will enable small public companies like ours to prioritize investments in factors that actually determine success or failure in the pharmaceutical industry, such as the science and technology underpinning our company's potential, expanding our product pipeline to treat new and broader patient populations, and the design and execution of clinical trials that enhance our opportunity to garner approval from the Food and Drug Administration, among others. While well-intentioned, SOX 404(b) has harmed small public companies because of its disproportionate expense, which diverts capital away from research and development, and the evidenceⁱ and our experience that it is not

material for or not a priority of our investors. We strongly believe that this proposed rule will benefit small public companies and their investors by freeing up more capital to hire talent, invest further in research and development, and expand our product pipeline to improve our ability to develop high quality and competitive products to treat the nation's most dire public health concerns. For these reasons, the SEC's proposal to expand relief from SOX 404(b) for small public companies is a welcome step forward to making our public capital markets more accessible and attractive to small companies.

We commend the SEC's efforts to ease the regulatory burdens facing small companies under the proposed rule.

Sincerely,

Damian Finio

A handwritten signature in black ink, appearing to read "Damian J. Finio", written over a horizontal line.

Chief Financial Officer, Teligent Inc.

ⁱ Study by Profs. Craig Lewis and Joshua T. White of Vanderbilt University, "Science or Compliance: Will Section 404(b) Compliance Impede Innovation by Emerging Growth Companies in the Biotech Industry?" February 2019, https://www.bio.org/sites/default/files/BIO_EGC_White_Paper_02_11_2019_FINAL.pdf.