Via Electronic Submission

September 25, 2020

Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-060

Re: Proposed Rule Regarding Reporting Threshold for Institutional Investment Managers
Securities Exchange Act of 1934 Release No. 34-89290
File Number S7-08-20

Dear Ms. Countryman:

The University of Virginia Investment Management Company ("UVIMCO") appreciates the opportunity to comment on the recent proposal by the U.S. Securities and Exchange Commission (the "Commission") to increase the reporting threshold for Form 13F reports by institutional investment managers from $100 million to $3.5 billion in publicly-traded equity securities (the "Proposed Rule"). We urge the Commission to withdraw the Proposed Rule.

The University of Virginia ("UVA") is a public institution of higher learning guided by a founding vision of discovery, innovation, and development of the full potential of talented students from all walks of life. It serves the Commonwealth of Virginia, the nation, and the world by developing responsible citizen leaders and professionals; advancing, preserving, and disseminating knowledge; and providing world-class patient care. UVIMCO provides investment management services to UVA and certain other nonprofit organizations that support UVA's mission. The endowment and other long-term funds managed by UVIMCO are vital to UVA's pursuit of its mission and vision for the future.

Because Form 13F disclosures are an important input into UVIMCO's investment process, the Proposed Rule would negatively impact our ability to support UVA's mission. UVIMCO uses the information included in Form 13F to monitor our external investment managers' activities; to perform cost-effective due diligence on a broad group of prospective new managers; and to conduct portfolio risk management. The Proposed Rule would limit our effectiveness in each of these three areas.

The information we receive from our managers other than through Form 13F disclosures varies widely in terms of its content, format, and timing. Consistent Form 13F data across our portfolio allows us to supplement and confirm this reporting. This enables accurate, efficient, and consistent monitoring of our investments. Thus, Form 13F disclosures, as provided under current law, play a critical role in our portfolio monitoring process.

Form 13F reporting also enables us to cost-effectively conduct due diligence on a broad set of prospective new investment managers. We use Form 13F data to develop a preliminary understanding of prospective managers' strategies based on their publicly reported portfolios. This

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initial screen expands the universe of prospective investment managers that we can consider with limited staffing resources. As a result, in this area and others, Form 13F disclosures facilitate cost-efficient capital allocation.

Finally, we use the information disclosed on Form 13F to better understand risk exposures across our portfolio. Form 13F data allows us to map our underlying investments to various industry, geographic, and other concentrations in our portfolio. In addition, Form 13F data enables us to understand the ownership structures of our underlying investments. The Proposed Rule would significantly limit our ability to assess these risk exposures, impairing our portfolio risk management capability.

Form 13F disclosures reduce the costs and improve the accuracy of our investment activities, and thus serve as an important resource for our stewardship of UVA's long-term assets. Incomplete or inconsistent information is of limited utility for each of the purposes described above. The current Form 13F reporting threshold provides a level of consistent transparency, creating an even playing field which inures to the benefit of all investors.

Although we support the Commission's goal of reducing regulatory costs for small managers, we note that the Proposed Rule would materially increase investment diligence and monitoring costs for institutional investors. If the Proposed Rule were adopted, UVIMCO would cease receiving Form 13F disclosures from a majority of our public equity managers (in number and value). We encourage the Commission to consider the costs that the Proposed Rule would impose on institutional investors. The returns generated by UVIMCO provide crucial financial support to UVA, which decreases the financial burden on students, patients and taxpayers.

We urge the Commission to withdraw the Proposed Rule, as we believe that current law appropriately balances regulatory costs for managers with benefits for investors and market transparency. However, in the event that the Commission determines to proceed with the Proposed Rule, we urge the Commission to reduce the proposed $3.5 billion filing threshold. Our analysis indicates that a smaller increase in the threshold to $500 million would mitigate most of the negative impacts on our own processes and costs.

We appreciate the opportunity to submit these comments and welcome further discussion with the Commission. If you have any questions or wish to discuss our comments in greater detail, please do not hesitate to contact us.

Sincerely,

University of Virginia Investment Management Company