



**U.S. Securities and Exchange Commission**  
100 F Street NE Washington, DC 20549-1090

2 March 2022

**Re: File No. S7-08-22: Enhancing Short Sale Disclosure**

I am contacting you as the CEO of FundApps; a RegTech company that automates beneficial ownership reporting in 102 countries. We have a unique vantage point to observe the differing approaches governments and supranational bodies have taken to this aspect of financial regulation, and how they have evolved over the past decade.

Many sophisticated financial markets already have a short selling regime in place, including Australia, Japan, Hong Kong, Singapore, South Korea, UK and the European Union amongst many others. The EU introduced their regime in 2012 and lowered the reporting thresholds in 2022. Singapore introduced their regime in 2019. The trend globally is clearly for short selling to have strict disclosure requirements.

Short selling has long been opaque in the US and the stakes have never been higher for those who partake. We believe that the proposals will add **much needed transparency** to the industry and we **support them fully**. Any criticisms on the basis of “adding burden” to market participants are unlikely warranted as with modern technology the requirements are easily automated and with minimal cost incurrence.

Andrew Patrick White  
CEO & Founder, FundApps