| Share Statistics | | Date - | Open 🔻 | Close 🔻 | Volume - | Date - | Open 🔻 | Close - | Volume - |
|---|---------------|-------------|---------|---------|------------|-------------|---------|---------|-----------|
| Avg Vol (3 month) ³ | 242.28k | 10-Mar-2021 | \$25.23 | \$30.28 | 60,298,900 | 26-May-2021 | \$21.61 | \$20.68 | 8,739,500 |
| | | 25-Feb-2021 | \$32.60 | \$21.53 | 38,329,400 | 26-Feb-2021 | \$19.10 | \$16.71 | 8,703,600 |
| | | 26-Jan-2021 | \$11.69 | \$10.00 | 34,562,700 | 25-Jan-2021 | \$3.65 | \$6.00 | 8,512,100 |
| Avg Vol (10 day) ³ | 21.7k | 27-Jan-2021 | \$17.52 | \$58.00 | 25,073,500 | 1-Mar-2021 | \$16.82 | \$18.95 | 8,323,500 |
| | | 25-Mar-2021 | \$16.00 | \$25.80 | 19,814,700 | 29-Mar-2022 | \$11.13 | \$9.47 | 8,212,100 |
| | | 2-Jun-2021 | \$26.31 | \$40.72 | 19,428,200 | 1-Feb-2021 | \$60.00 | \$35.00 | 7,973,000 |
| Shares Outstanding ⁵ | 9. 15M | 12-Mar-2021 | \$26.75 | \$27.88 | 16,085,300 | 11-Mar-2021 | \$26.99 | \$25.22 | 7,933,400 |
| | | 29-Dec-2020 | \$3.88 | \$3.44 | 15,319,000 | 28-May-2021 | \$26.26 | \$23.07 | 7,496,000 |
| | | 24-Feb-2021 | \$12.08 | \$18.44 | 13,351,700 | 3-Feb-2021 | \$26.75 | \$25.59 | 7,228,400 |
| Implied Shares Outstanding ⁶ | N/A | 29-Dec-2017 | \$1.42 | \$3.09 | 12,431,600 | 25-Jul-2022 | \$7.81 | \$11.20 | 7,202,400 |
| | | 13-Oct-2021 | \$22.64 | \$18.65 | 12,244,000 | 7-Jun-2021 | \$27.16 | \$27.60 | 6,778,900 |
| | | 29-Jan-2021 | \$72.86 | \$64.00 | 11,612,300 | 2-Feb-2021 | \$26.66 | \$20.00 | 6,671,000 |
| Float ⁸ | 5.14M | 28-Jan-2021 | \$74.00 | \$41.96 | 11,305,200 | 27-May-2021 | \$19.85 | \$22.82 | 6,530,600 |
| | | 3-Jun-2021 | \$37.55 | \$30.83 | 10,770,100 | 18-Feb-2021 | \$13.32 | \$14.25 | 6,529,600 |
| | | 8-Mar-2021 | \$15.54 | \$18.85 | 9,903,600 | 8-Jun-2021 | \$28.82 | \$28.33 | 6,455,200 |

October 14, 2022

Vanessa A. Countryman Secretary U.S. Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 205499–1090

Re: Release No. 34–94313; File No. S7–08–22 Short Position and Short Activity Reporting by Institutional Investment Managers

Ms. Countryman:

This letter serves to show support of the proposed rule by The Securities and Exchange Commission (the "Commission"). Today's market have shown inefficiencies (price suppression), manipulation (naked shorting), and monopolistic power. With this new rule, increasing the transparency of short positions addresses market and economic risk.

Additionally, current market mechanics allow for abusive trading practices where an individual investors position can be used against them when investing with brokers who practice PFOF and colluding with front-running firms who act as both a market maker and hedge fund. It is appalling how destructive derivatives such as swaps trading in the OTC market can be and how it can drive down the price of a stock acting as a long position in retails 401k's. This manipulation knows know bounds as the Commission simply isn't equipped with the data to prevent and penalize such practices.

With the wide range of short position products trading in the OTC, and overlooking the obvious reason on why the CFTC has yet to do anything to address risk brought on by the very thing they are tasked to monitor, it is of absolute importance for the Commission to have as much of this data as possible via this new rule in order to address whimsical market fluctuations, price manipulation/suppression, protection of retail and to maintain market order.

Sincerely,

Shalin Patel Engineer Chicago, IL