

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: File Number S7-08-22 Short Position and Short Activity Reporting by Institutional Investment Managers

To: Commissioner

Retail investors, like myself, are forced to operate in a market environment that is informationally asymmetric. There are currently insurmountable disadvantages to retail investors in the US equity markets. In order to stand on level ground with large institutions, family offices, and hedge funds, retail requires more information regarding short sale activity.

Proposed Rule 13f-2 begins to level the retail playing field. The short sale activity disclosures proposed in the proposed rule would provide retail investors critical insights into what large entities are doing with their investments. The more information retail has at our disposal, the better investment decisions we are able to make.

In addition, Proposed Rule 13f-2 provides greater transparency for the SEC into how markets are functioning. As the primary regulator of equity markets, the SEC is required to ensure that US markets are functioning in a way that is conducive to capital formation, attractive to investors all over the world, and free of corruption and fraud. The expanded reporting requirements proposed by rule 13f-2 are invaluable for the SEC's purpose.

Proposed Rule 13f-2 requires at maximum, a one month reporting period for short sale activity. While I appreciate the additional disclosure proposals, I believe that the one month reporting deadline falls short of what retail investors require to stand on even footing with larger institutions. I see no technological reasons that this one month reporting period cannot be shorted to one week, perhaps shorter.

I appreciate the opportunity you have given me to voice my opinions on Proposed Rule 13f-2.

Sincerely,

Michael K.