



November 4, 2013

Securities and Exchange Commission
Washington, DC

RE: Comments on S7-09-13 Crowdfunding
Definition of "Platform"

Dear Staff:

As technology geeks we would like to comment on the definition of "platform" as it appears on page 31 of the proposed rules. We feel it is important to have this clarified in the rules as a hostile state or other regulator, or even tort attorneys, may be able to limit or pervert the intended scope of the Act by means of a strict interpretation of what is (we believe) unintentionally written.

A "platform" is a software program, accessible via TCP/IP enabled applications, that is designed to provide an eco-system for issuers, investors, intermediaries and other interested parties with a means of conducting business pursuant to section 4(a)(6). Alternatively, and more commonly, it could be rephrased to replace "TCP/IP enabled applications" with "the internet".

A website is simply a browser accessible code base (usually HTML5, but also may be HAML, SUSY or other browser-recognizable code) that pulls data from, and accesses features and utilities of an application.

Although the rules allow for "similar electronic medium" it may be argued, by those with alternative agendas, that mobile apps, email, API's, XML, and other forms of TCP/IP technologies are not "similar" to websites as they do not use HTML or other code bases or methodologies that websites do.

As such we respectfully request that the definition be rewritten to reflect that a "platform" is an application, one that is for a specific purpose (crowdfunding) and is accessible by the internet.

Respectfully,

Scott Purcell
Founder, CEO