

JT Foxx Reviews the Administration of the Electronic Data Gathering, Analysis, and Retrieval System

RE: Administration of the EDGAR System, File Number S?-11-20

Dear Ms. Countryman,

My name is JT Foxx. I value the chance to present input to the Securities and Exchange Commission (SEC) proposal Administration of the Electronic Data Gathering, Analysis, and Retrieval System.

The Commission touches on numerous situations in Rule 15, consisting of identifying personally identifiable information (PII), cybersecurity threat, system and commission errors, unapproved submissions, and the potential for manipulation. Any of these triggering occasions can result in SEC actions such as the redaction of information from a filing, the elimination or prevention of entry or dissemination of an EDGAR filing, revocation of EDGAR access codes, or reassignment of the filing date for a submission that was delayed because of system issues.

The Commission suggests that these actions might be taken without advance notice to filers or others when immediate action is needed to avoid possible threats to the EDGAR system or to stop the circulation of inaccurate details to investors. The proposal defines that, when prior warning can not be given, the Commission will inform a filer and any other relevant person as quickly as possible after an action has been taken, with a written notification and a declaration of the basis for the action by email to the email address on the EDGAR account and the email of any type of relevant individual.

While I agree with the proposition's objectives, I have some concerns concerning the recommended SEC action of redacting info from a filing without first contacting the issuer before the redaction. I ask that the Commission reconsider this part of the proposal. Moreover, I want to motivate the Commission to alert the filer and relevant persons in advance prior to taking any of the actions noted in the proposition, if in any way possible.

However, I recognize that there might be circumstances where prior notification is not feasible. In such cases, I agree with the Commission's proposal to inform the filer and relevant individuals as soon as possible after the activity. I also recommend the Commission always to think about the issuer's supplier to be a "relevant individual," given their function in taking care of the company's EDGAR submission. Making sure that vendors who submit the declaring are included in the alert process is important, as the supplier might be able to explain or resolve the situation promptly given their role in the submission.

Thanks for the opportunity to offer recommendations on the Commission's proposed rule to enhance EDGAR entries' integrity and integrity. I hope you will consider my added suggestions that will likewise assist the SEC in fulfilling this proposal's objectives.

Respectfully submitted,

JT Foxx

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