



Overstock.com, Inc.  
6350 South 3000 East  
Salt Lake City, UT 84121  
Phone: (801) 947-3100  
Fax: (801) 947-3144

Via Electronic Submission and Overnight Mail

September 11, 2006

Ms. Nancy M. Morris, Secretary  
Securities and Exchange Commission  
100 F. Street, NE  
Washington, DC 20549-1090

Re: Comments on Proposed Amendments to Regulation SHO  
File No S7-12-06 (17 CFR Part 242, Rel. No. 34-54154)

Dear Secretary Morris:

Overstock.com, Inc., a Delaware corporation with its principal offices and operations located in Utah, is an online "closeout" retailer whose shares are publicly traded on the NASDAQ(GM). Overstock is pleased to comment on the SEC's proposed amendment to Regulation SHO.

Overstock has been continuously on the Regulation SHO threshold list since January 2005, with exception of a brief 20 day period in March and April 2005. While Overstock itself has been unable to learn from the SEC or the DTCC<sup>1</sup> the amount of fails to deliver in its stock since the adoption of Regulation SHO, according to a FOIA response issued by the SEC to a third party, the fails to deliver in Overstock increased from as little at 13,197 to as high as 2,321,990 during 2005<sup>2</sup>. Thus, Overstock believes it is uniquely qualified to provide an issuer's viewpoint on the proposals, as well as other measures the SEC should adopt to stop current abusive short selling practices.

The SEC's release proposing the amendments to Regulation SHO, while noting beneficial effects since the adoption of Regulation SHO, acknowledges "substantial and persistent fail to deliver positions that are not being closed out under existing delivery and settlement guidelines."<sup>3</sup> Overstock's experience with Regulation SHO underscores the point. As noted above, Overstock was continuously on the Regulation SHO threshold list throughout 2005 and 2006, and, despite Regulation SHO's aim to curb fails to deliver, during 2005 fails in Overstock's shares grew 63 times their original size, from 36,681 in January, to over 2,321,990 in December.<sup>4</sup> Other public

<sup>1</sup> See Exhibit "A" for correspondence with these entities.

<sup>2</sup> See Exhibit "B" FOIA Request 06-05783-FOIA.

<sup>3</sup> Release, at 7-8.

<sup>4</sup> See Exhibit "B." Overstock understands that the SEC sent a FOIA response to Floyd Norris of the New York Times that showed the amount of fails in Overstock shares grew to over 3.8 million during the second quarter of 2006; however, Overstock has not seen the actual FOIA response letter sent by the SEC to Mr. Norris.

companies have experienced similar results. Overstock's experience, and that of these other companies, demonstrates that while Regulation SHO may have some beneficial effects in the market generally, it comes seriously short of the mark in conferring these effects equally on all market participants.

Overstock believes the SEC's proposed amendments (i.e., repeal of the grandfather provision and narrowing of the options market maker exception) are good first steps toward adequate regulation of short selling activities. However, Overstock believes that two additional reform elements are necessary:

1. Transparency – Disclose the Volume of Fails. The SEC should amend Regulation SHO so that the aggregate volume of fails to deliver is reported daily for each threshold security – including fails to deliver that occur within the DTCC and outside the DTCC in “ex-clearing” transactions.<sup>5</sup>
2. Ownership – Require a Pre-Borrow for All Short Sales. The SEC should require that before any seller can short sell a stock, that seller must either have the stock in his possession (and have the right to sell it) or have entered into a bona fide contract to borrow the stock in advance of the sale.

During the SEC's July 12, 2006 hearing, Chairman Cox made it clear that the substantial number of persistent delivery failures highlights a serious problem, albeit one that he felt was primarily concentrated in a small percentage of equity securities. Overstock believes, however, that the number of overall persistent settlement failures and the number of issuers whose equity securities have persistent settlement failures will increase dramatically unless the SEC takes specific action on the present proposal and on additional measures proposed in this letter.

## **Amendments Proposed by the SEC**

### **Grandfather Provision**

When adopted, Regulation SHO's close-out requirements did not apply to positions that were established prior to the effective date of Regulation SHO, nor to positions in a security prior to its listing as a threshold security. The articulated justification for this grandfather provision, as noted in the proposing Release, was concern “about creating volatility through short squeezes.”<sup>6</sup>

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<sup>5</sup> Regulation SHO should provide the SEC with enforcement powers over the broker-to-broker contractual arrangement allowed by the Commission's Rules 15c3-3 and 15c6-1. The SEC must have the authority to review and enforce these contracts where these contracts clearly identify the “intent” to settle in 3 days. The SEC cannot rely on brokers to police each other on contracts because there is too high an incentive to forgive each other's delays. The SEC must penalize the buy-side broker who does not force the prompt settlement of a trade.

<sup>6</sup> See Release at 7-8.

However, this grandfathering of short positions threatens an equal measure of market volatility, only in the opposite (downward) direction because of the strong incentive to sell additional shares short to have them grandfathered prior to the implementation or listing date. Additionally, short squeezes have the beneficial effect of creating discipline in the market. It is unclear where the SEC might draw the line between "good" market volatility and "bad" market volatility – but certainly, it cannot be along the lines of favoring downward price pressure over price increases owing to short squeezes.

Overstock encourages the SEC to adopt its proposed amendment to remove Regulation SHO's thumb from the economic scale by abating all grandfathering provisions according to the phase-in schedule proposed in the Release. Overstock also encourages the SEC to escalate its examination and enforcement of compliance in this area – again, both in DTCC and "ex-clearing" transactions (see footnote 5).

#### **Narrowing the Market Maker Exemption**

Overstock supports the proposed narrowing of the close-out requirement under the market maker exception. Thirteen days should be more than sufficient time to close-out a failure to deliver related to an options position.

#### **Additional Amendments Needed to Solve the Problem**

##### **Transparency – Disclose the Volume of Fails**

Overstock agrees with Commissioner Atkins' position that aggregate fail data should be disclosed. Sunshine is the great disinfectant and more transparency will lead to the elimination of abuses and to more investor confidence and security. Without this full disclosure, it is difficult to know the level of "naked shorting" and its risk to the capital markets.

Issuers need better information about settlement fails to deliver in their shares. Currently, the Regulation SHO threshold lists simply contain the names of companies and dates and do not even quantify the number of shares that were not delivered. As such, it has become the means to impugn these companies by vague implications instead of precise facts. Companies and investors have the right to know more information about the underlying activity in the stock. As noted in above and in Exhibit "A," Overstock itself has been unable obtain from the SEC or the DTCC any information about the amount of fails to deliver in its stock since the adoption of Regulation SHO.<sup>7</sup>

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<sup>7</sup> One articulated reason withholding volume information on failures to deliver is the reluctance to disclose "trading strategies." Overstock fails to see how disclosure of the amount of the aggregated fails to deliver is disclosing any trading strategy. Moreover, if a trading strategy embraces willful failures to deliver, that strategy should not be shielded from the disclosure Overstock proposes.

As a start, Overstock urges the SEC to amend Regulation SHO so that the aggregate volume of fails to deliver is reported daily for each threshold security – including fails to deliver that occur within the DTCC and outside the DTCC in “ex-clearing” transactions (see footnote 5). Overstock believes that this increased transparency will lead to the elimination of abuses and to more investor confidence and security. Without this full disclosure, it is difficult to know the level of “naked shorting” and its risk to the capital markets. Further, Overstock urges the SEC to work with issuers and the financial services industry to develop a means to disseminate this information to the broader market, which will elevate the threshold list’s utility beyond merely being a list of target companies for abusive short sellers.<sup>8</sup>

#### **Ownership – Require a Pre-Borrow (or at least a Firm Pre-Locate) for All Short Sales**

Short selling oversight must include reliable locate, borrow and delivery components. Currently, under Regulation SHO, prior to initiating a short sale where the selling broker or customer is not in possession of the shares, the short seller need only have “reasonable grounds” to believe that the security can be borrowed so that the security can be delivered on the delivery date. This “reasonable grounds” standard amounts to an enormous loophole of which abusive short sellers take full advantage; it is a fuzzy standard, fraught with uncertainty, inviting abusive short sellers to test the limits of the SEC’s already strained enforcement resources.

The “reasonable grounds” standard creates a serious problem in an overestimation of the availability of stock for borrow. When a borrowed share is not taken out of the pool of stock available to complete a valid “locate,” the share can be re-“located” many times without ever being borrowed. When it comes time to obtain the stock, many hands reach for the same “located” shares, which of course can only satisfy a single transaction, leaving the others to seek alternative sources, and, if unsuccessful, to fail at delivery.

To remedy the “reasonable grounds” loophole, Overstock urges that the SEC require that a short seller must either have the stock in his possession (and have the right to sell it) or have entered into a bona fide contract to borrow the stock in advance of the sale. This step alone should prevent the majority of willful, strategic fails to deliver. Alternatively, stocks that are “located” for borrow should be, by firm contract, placed in a separate “locate pool,” or somehow removed from multiple availability, until the trade has settled, thus eliminating multiple “locates.”<sup>9</sup> If the trade then fails to be executed after a specified period, the “located” stock can be returned to a position of availability for another “locate,” and so on. Whatever system is ultimately

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<sup>8</sup> As it should, the SEC requires that issuers disclose their total number of issued shares; this is clearly useful information for shareholders and potential shareholders. Similarly, issuers, shareholders and potential shareholders should be able to access information on the volume of failures to deliver.

<sup>9</sup> The technology to do this is currently available at [locatestock.com](http://locatestock.com).


Ms. Nancy M. Morris  
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implemented, it should carefully guard against the "multiple borrow," or "multiple locate" circumstance that is so prevalent and harmful to the capital markets at present.

\* \* \*

The system under the current Regulation SHO allows for abusive and illegitimate short selling. Trades are executed without the basic economic discipline of supply and demand. Indeed, while short selling introduces valuable information into the market, because abusive and illegitimate short selling has no cost to the "seller," its information is valueless. Abusive short selling is used to manipulate markets and purposefully drive down thinly traded stocks to the detriment of investors and our capital markets generally. The SEC must continue to protect innocent investors and public companies by minimizing the manipulation of our capital markets. The interests of abusive short seller must not be placed ahead of investors and employees who often depend on these companies for their livelihood and retirement. Overstock applauds the SEC's review of the problems presented by abusive short selling and strongly urges the SEC to adopt, not only the two amendments proposed in the Release, but also to make the two additional modifications to Regulation SHO proposed in this letter.

Sincerely,



Patrick M. Byrne  
Chairman and Chief Executive Officer

Enclosures

cc: Christopher Cox, Chairman, U.S. Securities and Exchange Commission  
Paul S. Atkins, Commissioner, U.S. Securities and Exchange Commission  
Roel C. Campos, Commissioner, U.S. Securities and Exchange Commission  
Kathleen L. Casey, Commissioner, U.S. Securities and Exchange Commission  
Annette L. Nazareth, Commissioner, U.S. Securities and Exchange Commission  
Robert L. Colby, Acting Director, Division of Market Regulation, U.S. Securities and Exchange Commission  
John W. White, Director, Division of Corporation Finance, U.S. Securities and Exchange Commission

EXHIBIT "A"



Overstock.com, Inc.  
6350 South 3000 East  
Salt Lake City, UT 84121  
Phone: (801) 947-3114  
Fax: (801) 947-3144  
Email: JJohnson@Overstock.com

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

April 14, 2006

U.S. Securities & Exchange Commission  
FOIA Office, Stop 0-56432  
General Green Way, Alexandria, Virginia 22312-2413

**RE: FOIA Request for daily aggregate fails data and aggregate daily 'open positions', i.e., shares awaiting delivery either long or short.**

Dear Madam or Sir:

We hereby request, pursuant to the Freedom of Information Act, the daily aggregated data for the above subject matter for the security Overstock.Com, Inc., CUSIP number 690370101, traded on the Nasdaq National Market as symbol OSTK, from May 1, 2002 up to the present.

Please provide in electronic database or spreadsheet format (such as Excel) if possible. If convenient, you may email the information to me.

Sincerely,

A handwritten signature in black ink that reads 'Jonathan E. Johnson III'. The signature is written in a cursive style with a large initial 'J'.

Jonathan E. Johnson III  
SVP, Corporate Affairs & Legal



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
OPERATIONS CENTER  
6432 GENERAL GREEN WAY  
ALEXANDRIA, VA 22312-2413

OFFICE OF FILINGS AND  
INFORMATION SERVICES

Mail Stop 0-5

May 10, 2006

Mr. Jonathan E. Johnson, III  
SVP, Corporate Affairs & Legal  
Overstock.com, Inc.  
6350 South 3000 East  
Salt Lake City, UT 84121

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552  
Request No. 06-04651-FOIA

Dear Mr. Johnson:

This letter partially responds to your request, dated April 14, 2006, and received in this office on April 18, 2006, for certain information concerning Overstock.com, Inc.

Please be advised, we are consulting with other Commission staff regarding information that may be responsive to your request. We will advise you of our findings as soon as we receive a response.

In the interim, if you have any questions, please contact Mrs. Sonja Osborne of this office at (202) 551-8371.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debra Walker".

Debra Walker  
Lead Research Specialist  
FOIA/Privacy Act Office

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
OPERATIONS CENTER  
6432 GENERAL GREEN WAY  
ALEXANDRIA, VA 22312-2413

OFFICE OF FILINGS AND  
INFORMATION SERVICES

Mail Stop 0-5

June 12, 2006

Mr. Jonathan Johnson, III  
SVP, Corporate Affairs & Legal  
Overstock.com, Inc.  
6350 South 3000 East  
Salt Lake City, UT 84121

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552  
Request No. 06-04651-FOIA

Dear Mr. Johnson:

This letter responds to your request for the daily aggregate "fail to deliver" data for Overstock.com, Inc.

After consultation with the staff, we are withholding the requested data, since it constitute confidential commercial or financial information, the release of which could cause substantial competitive harm to the submitter under 5 U.S.C. § 552(b)(4), 17 CFR § 200.80(b)(4).

The data is also being withheld since it is relating to an operating and inspection report prepared by, on behalf of, or for the use of the Commission or any agency responsible for the regulation or supervision of financial institutions under 5 U.S.C. 552 (b) (8),  
17 CFR 200.80 (b) (8).

You have the right to appeal our decision to our General Counsel under 5 U.S.C. § 552(a)(6), 17 CFR § 200.80(d)(5) and (6). Your appeal must be in writing, clearly marked "Freedom of Information Act Appeal," and should identify the requested records. The appeal may include facts and authorities you consider appropriate.



Mr. Jonathan Johnson

June 12, 2006

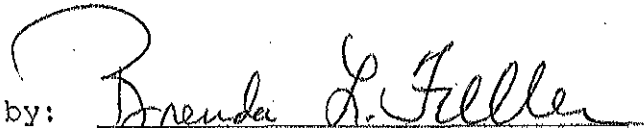
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Send your appeal to the FOIA/Privacy Act Office, Securities and Exchange Commission, Operations Center, 6432 General Green Way, Mail Stop O-5, Alexandria, VA 22312-2413, or deliver it to Room 1418 at that address. Also, send a copy to our General Counsel, Securities and Exchange Commission, 100 F Street NE, Washington, D.C. 20549, or deliver it to Room 1120 at that address.

If you have any questions, please contact Mrs. Sonja Osborne of my staff at (202)551-8371.

Sincerely,  
FOIA/Privacy Act Officer

by:



Brenda L. Fuller

FOIA/Privacy Act Branch Chief



Overstock.com, Inc.  
6350 South 3000 East  
Salt Lake City, UT 84121  
Phone: (801) 947-3114  
Fax: (801) 947-3144  
Email: JJohnson@Overstock.com

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

July 6, 2006

U.S. Securities & Exchange Commission  
FOIA Office, Stop 0-56432  
General Green Way, Alexandria, Virginia 22312-2413

**RE: FOIA Request for daily aggregate fails data and aggregate daily 'open positions', i.e., shares awaiting delivery either long or short, and the terminology used in gathering data on long and short positions in equity securities.**

Dear Madam or Sir:

We hereby request, pursuant to the Freedom of Information Act, ("FOIA"), the Aggregate Continuous Net Settlement Failure Data for Overstock.com, Inc. (NASDAQ: OSTK) (CUSIP number 690370101), for the period of January 1, 2004 thru May 1, 2006. We believe that these dates are far enough back in time that this information is no longer considered proprietary to any possible trading strategies and similar data has been provided by the United States Securities and Exchange Commission ("SEC") under FOIA 06-5783, 06-05048, 06-04383, 05-702, 05-7221, 05-7227 and 05-5810. Please provide in electronic database or spreadsheet format (such as Excel) if possible. If convenient, you may email the information to me.

In addition, we request all documents, memoranda, policy statements, staff guidelines, staff manuals, directives, and other such documents or revisions thereto that are currently in effect, or were in effect at any time on or after January 1, 2004, that describe the procedures and policies to be used by the SEC and its enforcement staff in determining how to define reported data regarding legitimate short sales, failed short sales, failed long sales, open sales and any other type of transaction with results in a failure to deliver.

Overstock asserts that nothing in this request does relates to a specific operation or inspection report prepared by, or on behalf of, of for the use of the SEC.

Sincerely,

Jonathan E. Johnson III  
SVP, Corporate Affairs & Legal



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
STATION PLACE  
100 F STREET, NE  
WASHINGTON, DC 20549

OFFICE OF FILINGS AND  
INFORMATION SERVICES

Mail Stop 5100

August 08, 2006

Mr. Jonathan Johnson  
Overstock.com, Inc.  
6350 South 3000 East  
Salt Lake City, UT 84121

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552  
**Request No. 06-07006-FOIA**

Dear Mr. Johnson:

This letter partially responds to your request, dated July 06, 2006, and received in this office on July 24, 2006, for information concerning **DAILY AGGREGATE FAILS DATA AND AGGREGATE DAILY OPEN POSITIONS**.

Please be advised, we are consulting with other Commission staff regarding information that may be responsive to your request. We will advise you of our findings, as well as the actual cost to review the records, as soon as we receive a response.

In the interim, if you have any questions, please call me at (202) 551-8323.

Sincerely,

A handwritten signature in dark ink that reads "Ollie R. Wade".

Ollie R. Wade  
FOIA/Privacy Act Research Specialist



Overstock.com, Inc.  
6322 South 3000 East, Suite 100  
Salt Lake City, UT 84121  
Phone: (801) 947-3114  
Fax: (801) 947-3144  
Email: JJohnson@Overstock.com

CERTIFIED MAIL

March 4, 2005

Ms. Jill M. Considine, Chairman, CEO and President  
Mr. Donald F. Donahue, COO  
Richard B. Nesson, Esq, Managing Director and General Counsel  
The Depository Trust & Clearing Corporation  
55 Water Street  
New York, New York 10041-0099

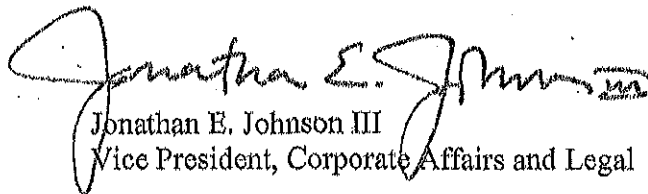
RE: Failure to Deliver

Dear Ms. Considine and Messrs. Donahue and Nesson:

I am the Vice President, Corporate Affairs and Legal of Overstock.com, Inc. (OSTK), a publicly-traded stock listed on NASDAQ.

Overstock.com has been on the Reg SHO Threshold list since January 28, 2005. I would like to find out the size of Overstock.com's failure to delivers. I am told that the DTCC will release that information to me, as an agent from the company. Please tell me what the size of our failures-to-deliver problem is. If you cannot provide this information, please cite the law or regulation which allows you not to do so.

Sincerely,



Jonathan E. Johnson III  
Vice President, Corporate Affairs and Legal

cc: Patrick M. Byrne, Chairman and President, Overstock.com

**PROSKAUER ROSE LLP**

1585 Broadway  
New York, NY 10036-8299  
Telephone 212.969.3000  
Fax 212.969.2900

LOS ANGELES  
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BOCA RATON  
NEWARK  
NEW ORLEANS  
PARIS

**Edward A. Kwalwasser**  
Senior Counsel

Direct Dial 212.969.3515  
ekwalwasser@proskauer.com

March 30, 2005

Jonathan E. Johnson III  
Vice President, Corporate Affairs and Legal  
Overstock.com, Inc.  
6322 South 3000 East, Suite 100  
Salt Lake City, UT 84121

Dear Mr. Johnson:

This is in response to your letter of March 4, 2005 to Depository Trust & Clearing Corporation in which you request certain trading and clearing information regarding Overstock.com common stock.

As counsel for National Securities Clearing Corporation ("NSCC") I regret to inform you that the information you seek is confidential information of participants of NSCC. Pursuant to NSCC's Rule 49 this information is not available for public inspection and may not be released to entities other than regulatory or self-regulatory organizations.

I am sorry that we could not be of any greater help in this matter.

Very truly yours,



Edward A. Kwalwasser

EAK:mig

EXHIBIT "B"



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
OPERATIONS CENTER  
6432 GENERAL GREEN WAY  
ALEXANDRIA, VA 22312-2413

OFFICE OF FILINGS AND  
INFORMATION SERVICES

Mail Stop O-5

June 15, 2006

David E. Patch  
21 Pheasant Lane  
Topsfield, MA 01983

RE: Freedom of Information Act (FOIA), 5 U.S.C. § 552  
Request No. 06-05783-FOIA

Dear Mr. Patch:

This letter is our final response to your request for information concerning Overstock.com.

After consulting with the staff, we have determined to release the requested information (copy enclosed), which may be responsive to your request.

If you have any questions, please contact me at (202) 551-8352.

Sincerely,

A handwritten signature in cursive script that reads "Jason Luetkenhaus".

Jason Luetkenhaus  
FOIA/Privacy Act Research Specialist

Enclosure

FOIA05783

**Total Fails by Date for Overstock.com  
January 1, 2005 to December 31, 2005**

<b>Date</b>	<b>Total Fails (shares)</b>
20050103	36,681
20050104	37,113
20050105	37,144
20050106	38,354
20050107	25,314
20050110	86,953
20050111	28,675
20050112	44,367
20050113	146,039
20050114	69,054
20050118	54,468
20050119	98,960
20050120	91,416
20050121	120,814
20050124	191,558
20050125	140,805
20050126	271,985
20050127	281,055
20050128	373,396
20050131	437,238
20050201	639,018
20050202	593,320
20050203	475,629
20050204	446,201
20050207	341,989
20050208	277,428
20050209	245,039
20050210	332,472
20050211	395,683
20050214	247,270
20050215	243,687
20050216	277,034
20050217	277,191
20050218	343,255
20050222	246,488
20050223	230,959
20050224	181,524
20050225	146,262
20050228	67,826
20050301	67,379
20050302	94,060
20050303	106,599
20050304	81,503
20050307	196,222
20050308	224,163
20050309	176,812
20050310	145,595
20050311	196,127

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20050314	210,392
20050315	42,497
20050316	49,204
20050317	90,840
20050318	142,950
20050321	65,922
20050322	30,048
20050323	68,578
20050324	69,616
20050328	22,898
20050329	13,197
20050330	23,151
20050331	24,432
20050401	34,119
20050404	23,101
20050405	41,089
20050406	40,131
20050407	85,190
20050408	74,848
20050411	32,895
20050412	175,366
20050413	38,072
20050414	20,392
20050415	61,585
20050418	185,909
20050419	163,839
20050420	188,089
20050421	263,483
20050422	215,998
20050425	191,935
20050426	508,172
20050427	374,802
20050428	513,152
20050429	424,497
20050502	455,334
20050503	596,307
20050504	911,402
20050505	1,217,695
20050506	1,096,251
20050509	903,294
20050510	645,866
20050511	643,022
20050512	468,267
20050513	504,995
20050516	535,493
20050517	623,532
20050518	624,069
20050519	787,261
20050520	700,148
20050523	748,422
20050524	747,875
20050525	827,877



FOIA05783

20050526	463,336
20050527	286,744
20050531	266,630
20050601	182,434
20050602	258,481
20050603	417,273
20050606	475,498
20050607	483,486
20050608	432,019
20050609	336,105
20050610	395,607
20050613	388,571
20050614	180,316
20050615	202,481
20050616	185,556
20050617	96,206
20050620	209,769
20050621	95,817
20050622	476,412
20050623	485,598
20050624	494,381
20050627	494,790
20050628	453,930
20050629	333,929
20050630	202,728
20050701	238,415
20050705	214,952
20050706	235,927
20050707	203,218
20050708	355,417
20050711	401,312
20050712	466,726
20050713	668,789
20050714	626,255
20050715	584,153
20050718	584,138
20050719	456,870
20050720	503,574
20050721	445,819
20050722	492,312
20050725	472,453
20050726	417,918
20050727	422,271
20050728	448,603
20050729	504,123
20050801	550,185
20050802	591,021
20050803	989,744
20050804	1,092,516
20050805	1,133,014
20050808	1,127,782
20050809	1,006,632

FOIA06783

20050810	994,948
20050811	945,792
20050812	874,639
20050815	870,509
20050816	866,105
20050817	1,040,286
20050818	1,223,226
20050819	1,198,478
20050822	1,209,616
20050823	1,262,626
20050824	979,699
20050825	1,068,887
20050826	1,043,878
20050829	1,046,328
20050830	1,061,091
20050831	1,036,244
20050901	1,062,460
20050902	1,089,422
20050906	1,103,302
20050907	1,249,861
20050908	1,224,503
20050909	1,154,985
20050912	1,199,625
20050913	1,203,792
20050914	1,090,950
20050915	1,106,487
20050916	1,045,236
20050919	1,203,140
20050920	1,319,187
20050921	1,295,651
20050922	1,348,562
20050923	1,503,029
20050926	1,747,719
20050927	1,841,123
20050928	1,869,245
20050929	1,877,718
20050930	1,903,826
20051003	1,921,371
20051004	1,965,903
20051005	1,973,726
20051006	1,776,791
20051007	1,973,085
20051011	1,871,592
20051012	1,869,643
20051013	1,874,587
20051014	1,892,639
20051017	2,096,239
20051018	2,195,093
20051019	2,175,433
20051020	2,076,836
20051021	2,190,774
20051024	2,321,990

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20051025	2,308,434
20051026	2,076,317
20051027	2,061,781
20051028	2,094,374
20051031	2,158,703
20051101	2,219,904
20051102	2,254,706
20051103	2,208,882
20051104	2,136,209
20051107	2,063,731
20051108	1,875,256
20051109	1,927,953
20051110	2,060,243
20051114	2,103,252
20051115	2,100,628
20051116	2,066,507
20051117	2,082,433
20051118	2,120,031
20051121	2,130,961
20051122	2,069,399
20051123	2,075,771
20051125	2,122,541
20051128	2,100,865
20051129	2,099,440
20051130	2,068,314
20051201	2,087,263
20051202	2,074,615
20051205	2,139,819
20051206	2,130,889
20051207	1,949,787
20051208	1,837,230
20051209	1,965,407
20051212	1,953,691
20051213	1,879,452
20051214	1,753,766
20051215	1,768,461
20051216	1,899,010
20051219	1,812,231
20051220	1,848,852
20051221	2,166,747
20051222	2,062,349
20051223	2,105,501
20051227	2,111,883
20051228	2,131,278
20051229	2,026,646
20051230	2,062,328

Note: Includes all dates with at least 10,000 shares in total falls.  
Source: DTCC