

Dear SEC staff,

I'm writing to urge you to reconsider your rule change S7-14-19 that would block quotes for OTC companies not currently filing with the SEC. In its proposed form, this would have disastrous consequences for many legitimate companies and their shareholders. This indiscriminate action would penalize many good companies for the actions of a number of bad companies.

Of the many good companies in the OTC space that do not provide any information to the SEC, an example is Coal Creek Company (CCRK). They are very prompt in proactively mailing audited annual reports to shareholders every spring and have continuously paid quarterly dividends for many years.

Many of these companies are simply protecting shareholder value, looking at the increased costs required to file registered financials with the SEC and opting to communicate with shareholders themselves when it comes to financial data. A first step would be to provide a lower cost alternative.

Finally, if you were dead-set on changing something in regards to companies who choose not to file with the SEC, a first step would be to change your definition of "shareholders of record". Many times there are nowhere close to <300 shareholders of record if not for the SEC's rule that allows companies to consider them to be only one if shares are held in street name.

I ask you to please reconsider this rule which would completely wipe out millions if not billions of dollars of shareholder value, many of this belonging to retail investors. Don't punish shareholders of profitable, quality companies due to the actions of a few bad companies.

Thank you,

Anthony Perala, CFA