

F. Mark Reuter

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December 13, 2019

Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

Re: Reference No. 34-87115; File Number S7-14-19

Dear Commissioners:

We are writing on behalf of our client, a corporation having shares that trade in the OTCQX market, to comment on the Commission's proposed amendment to 17 CFR 240, 15c2-11 for the publication or submission of quotations without specified information.

We support the proposal's recognition of the OTC Markets Group's determinations with respect to current information when bringing companies to the public markets. The disclosure framework developed by the OTC Markets Group, particularly for OTCQX companies, provides investors with robust information comparable to the information in current and periodic reports filed by registrants under Section 13 or 15(d) of the Securities Exchange Act of 1934 and by companies qualified to offer securities pursuant to Regulation A. As disclosure counsel for an OTCQX corporation and other companies with shares trading on the Nasdaq or NYSE markets, as the case may be, we have a high degree of confidence in the OTC Markets Group's marketplace designations, compliance monitoring processes and disclosure standards. We support the opportunity for the OTC Link ATS to serve as a qualified interdealer quotation system and "information repository" providing compliance determinations pursuant to Rule 15c2-11.

Sincerely,

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