



September 2, 2020

Securities and Exchange Commission  
100 F Street NW  
Washington, DC 20549-1090

RE: Release No. 34-87115; File No. S7-08-19:

Ladies and Gentlemen:

MZCHI, LLC ("MZHCI") appreciates the opportunity to provide comments on the Proposed Rule 15c2-11 under the Securities Exchange Act of 1934.

MZHCI is the US division of MZ Group, a multinational company and a global leader in investor relations and corporate communications. We provide a full spectrum of personalized IR services supported by technological innovation and deliver measurable results to emerging public companies listed on US Exchanges including the OTC Markets Group.

The OTC Markets are a vehicle for capital raising for small companies which are not able to access the public markets through the NASDAQ and NYSE requirements. MZHCI supports the Commission's goals of providing greater transparency to investors in OTC securities and ensuring stronger protections for market participants in meeting minimum disclosure standards including sensible measures to lessen burdensome inefficiencies. Many of these companies are creating the future of our economy and our way of life and are now restricted in their efforts due to burdensome measures. Companies who are compelled to comply with minimum reporting requirements will go a long way to ensure transparency and ensure investors the opportunity to make informed decisions with publicly available information while strengthening the markets. In doing so, many of these emerging companies will continue to be able to implement their strategy and advance to the broader investor bases on the NASDAQ or NYSE

MZHCI supports the modernization of Rule 15c2-11 to better reflect current diversity of the markets by opening the door of opportunity for many innovative products and services driving our economy into the future.

We appreciate the opportunity to provide our input on this proposed Amendment. We continue to support not only our clients but also the investors who put their trust in them and hope the Commission will continue to address concerns and opportunities to make our markets stronger and available to all who want to participate.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ted Haberfield', written over a light blue horizontal line.

Ted Haberfield  
Chairman & President