

December 4, 2015

**VIA EMAIL**

Mr. Brent J. Fields  
Secretary  
Securities and Exchange Commission  
100 F. Street, NE  
Washington, D.C. 20549-1090

Re: File Number S7-18-15 - Proposed Amendments to Rules of Practice

Dear Mr. Fields:

I write in further response to the Securities and Exchange Commission's request for comments on proposed amendments to the Rules of Practice. I include four links to four separate comments provided in the Securities Diary Blog on the SEC's proposed rule changes. I believe these comments deserve consideration and agree that the proposed rule changes, though a step in the right direction, remain inadequate. The aforementioned links are:

<http://securitiesdiary.com/2015/10/08/why-the-secs-proposed-changes-to-its-rules-of-practice-are-woefully-inadequate-part-i/>

<http://securitiesdiary.com/2015/11/05/why-the-secs-proposed-changes-to-its-rules-of-practice-are-woefully-inadequate-part-ii/>

<http://securitiesdiary.com/2015/11/18/why-the-secs-proposed-changes-to-its-rules-of-practice-are-woefully-inadequate-part-iii/>

<http://securitiesdiary.com/2015/12/04/why-the-secs-proposed-changes-to-its-rules-of-practice-are-woefully-inadequate-part-iv/>

Respectfully submitted,



Stephen E. Hudson