

FINANCIAL INFORMATION FORUM

January 7, 2022

By electronic mail to rule-comments@sec.gov

Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090
Attn: Vanessa A. Countryman, Secretary

Re: File Number S7-18-21: Reporting of Securities Loans

Dear Ms. Countryman,

The Financial Information Forum (FIF)¹ appreciates the opportunity to comment on the recent rule proposal issued by the Securities and Exchange Commission (the Commission) on Reporting of Securities Loans.² The proposed rule is intended to “increase the transparency and efficiency of the securities lending market by requiring any person that loans a security on behalf of itself or another person to report the material terms of those securities lending transactions and related information regarding the securities the person has on loan and available to loan to a registered national securities association (“RNSA”).”³ The proposed rule “would also require that the RNSA make available to the public certain information concerning each transaction and aggregate information on securities on loan and available to loan.”⁴

The FIF Securities Lending Transparency Working Group is currently working on a comment letter on this rule proposal. The FIF Working Group is focused on identifying specific implementation and interpretive challenges with the rule as proposed and suggesting alternative approaches, where applicable. FIF and our members have learned from past experience that identifying and addressing implementation challenges during the rulemaking stage can help to avert problems at the implementation stage and achieve a more effective implementation of a new regulation or a regulatory change.

FIF members have been engaged in extensive discussions relating to the rule proposal. Given the complexity and scope of the issues presented by the rule proposal, the comment period determined by the Commission does not provide sufficient time for FIF to finalize our comment letter on the rule

¹ FIF (www.fif.com) was formed in 1996 to provide a centralized source of information on the implementation issues that impact the securities industry across the order lifecycle. Our participants include broker-dealers, exchanges, back office service bureaus, and market data, regulatory reporting and other technology vendors in the securities industry. Through topic-oriented working groups, FIF participants focus on critical issues and productive solutions to technology developments, regulatory initiatives, and other industry changes.

² Securities Exchange Act Release No. 93613 (Nov. 18, 2021), 86 FR 69802 (December 8, 2021), available at <https://www.govinfo.gov/content/pkg/FR-2021-12-08/pdf/2021-25739.pdf> (“Proposing Release”).

³ Proposing Release, p. 1.

⁴ Proposing Release, p. 1.

proposal. FIF and our members continue to actively discuss the issues presented in the rule proposal. FIF intends to submit our comment letter during the next two to three weeks.

Very truly yours,

/s/ Howard Meyerson

Howard Meyerson
Managing Director, Financial Information Forum