

October 8th, 2022

Vanessa Countryman, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609

**Re: Reporting of Securities Loans (File No. S7-18-21)**

Dear Secretary Countryman:

I am writing in strong support of rule 10c-1, 'Reporting of Securities Loans'.

A short seller is not an investor, but the opposite. When short selling practices occur in the dark — and 'current' short sale information is provided long after a position has been entered into — retail investors and the like cannot be aware of the risks that they take on when buying securities. You can see why this lack of information represents a problem for all investors, who are expected to invest on incomplete and dated short sale information.

I support the intraday 15-minute reporting requirement. The cost and effort involved with this is justified to help in early identification of abusive shorting practices — to reduce the ability of toxic market participants to hide behind loopholes and to attempt to prevent such fraud occurring in the capital markets.

The new rule would also provide any victimized companies a greater ability to defend themselves against predatory short selling, as short selling in the dark harms true competition and price discovery.

The enactment of this rule would also introduce the ability for the general public as well as public companies to serve as watchdogs for the SEC as an initial line of defense against abusive practices, by being able to more granularly monitor short selling for securities fraud for those securities they are invested in, helping and strengthening the SEC's ability to fulfill its mandate and to help weed out market participants that are working against SEC rules, all at no additional cost to the SEC.

I am a strong supporter of transaction by transaction reporting. It is clear that aggregated reporting is not transparent and provides far too much rope where fraud can be hidden in aggregates. Why should one individual or entity have to suffer a worse execution while another

individual or entity benefits from a better execution — just because it is more convenient for certain institutions to report their short selling practices in the aggregate? It is wholly unfair and contrary to the requirement of best execution, and so it should be a mandated requirement for transaction by transaction reporting.

Sincerely,

A Concerned Investor