



October 2, 2024

Vanessa Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

**Re: SEC File Number S7-2024-05 – Financial Data Transparency Act Joint Data Standards (the “Notice”)**

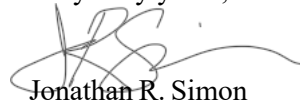
Dear Secretary Countryman:

Shareholders, who ultimately bear the indirect costs of government-mandated licensing fees imposed on reporting entities such as mutual funds and ETFs, stand to benefit from the expedited implementation of open license data standards as outlined in the proposed rule.

Van Eck Associates Corporation and Van Eck Absolute Return Advisers Corporation (“VanEck”) appreciate the opportunity to comment on the Notice and commend the Securities and Exchange Commission (“SEC”) for its efforts to reduce this burden and strongly urge the SEC to move quickly in implementing these standards, which represent a crucial shift away from the current reliance on proprietary identifiers.

Thank you again for this opportunity to provide our comments on this pivotal regulatory advancement. If you have any questions, please feel free to contact me at (212) 293-2029 or via email at [jsimon@vaneck.com](mailto:jsimon@vaneck.com).

Very truly yours,



Jonathan R. Simon  
General Counsel