

December 8, 2016

Via electronic submission

Mr. Brent J. Fields  
Secretary, Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

**Re: File No. S7-22-16 Amendments to Securities Transaction Settlement Cycle**

Dear Mr. Fields:

I would like to respond to the U.S. Securities and Exchange Commission to amend Rule 15c6-1(a) under the *Securities Exchange Act* of 1934 to shorten the standard settlement cycle for securities transactions from T+3 business days to T+2 business days.

From the perspective of a retail investor such as myself, it would make a lot of sense to further shorten the settlement cycle as the retail investor is usually in greater need of direct access to funds, and would be able to gain access to funds in a timelier manner upon the selling of their investments. Institutional investors and high-speed traders, while not in its entirety, are more likely to trade for significant profits, and at a faster turnover. Though it would be beneficial for them that the settlement cycle be reduced from T+3 to T+2 as rollover of capital might ease liquidity demands, simultaneously increasing trade activity and frequency, the amendment will affirmatively benefit the retail investor.

There is broad support, however, for the reduction of the standard settlement cycle. The *Investor Advisory Committee* presented, in a report dated February 12, 2015, that a shortening of the settlement period would decrease risk levels and increase certainty levels. Trust issues have the potential to be mitigated as the period shortens, as pressure increases on both ends for the deal to go through. The IAC also states that a shortened settlement cycle may in fact, reduce the amount of margin needed to settle transactions.

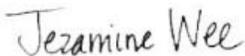
Additionally, overwhelming support for the reduction of the standard settlement cycle comes with the acknowledgment that the move will better align US settlement cycles with those in many European and Asian markets. Trades in the European Union have moved to T+2 as of October 2014, Hong Kong and South Korea also have a T+2 settlement cycle, while Canada and Japan are expected to follow suite with the move to T+2 following the United States' implementation of the amendment. The cross-border consistency is inherently important as mismatched settlement cycles increases hedge risks during the lag time between settlements

across different equity markets. Global associations such as *the Canadian Capital Markets Association* have also expressed support, stating that their joint capital markets and stakeholders will directly benefit from the reduction, especially stakeholders in both Canada and the US that would benefit from minimized cost and confusion. The IAC is also in firm support of the proposed amendment, and in fact, has even suggested a move to T+1.

There is further suggestion from the *Bloomberg Group* to begin automation of the process by institutional firms and investors, stating that there is a high probability that automation will in fact, further reduce counterparty risk, reduce margins and thus increase liquidity, theoretically increasing brokerage commissions as a result of an increase in the frequency of transactions. Lastly, it is expected to facilitate further harmonization on a global scale, and to provide improved stability for the US market and its investors.

Thank you for the opportunity to comment on this proposed amendment to reduce the standard settlement cycle from T+3 to T+2. I am strongly convinced that this amendment will be largely beneficial for multiple groups of people, and will have an overall positive impact as witnessed in the last amendment in 1993, shortening the standard settlement cycle from T+5 to T+3.

Sincerely,



Jezamine Wee  
Student  
Mendoza College of Business  
University of Notre Dame