

C H I L T O N
INVESTMENT COMPANY

October 9, 2008

Bradley Bondi, Esq.
Office of Commissioner Troy A. Paredes
U.S. Securities and Exchange Commission
100 F Street, NE, Room 10400
Washington, DC 20549

Re: Emergency Short-Selling Orders

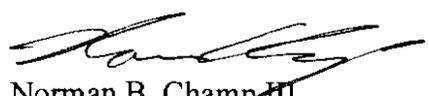
Dear Mr. Bondi:

Thank you for taking the time to meet with me and other representatives of the Managed Funds Association on Wednesday, October 1 at Commission headquarters in Washington, D.C. We were grateful for the opportunity to convey our concerns about the Orders and the adverse consequences of public disclosure of detailed short positions.

We understand how busy the staff is and appreciate you taking the time to meet with us.

Please feel free to call me at 646-443-7888 or email me (nchamp@chiltoninc.com) if there are any questions that I can answer.

Very truly yours,



Norman B. Champ III
Executive Vice President
and General Counsel