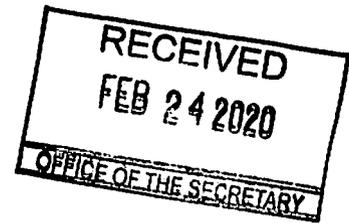


February 14, 2020

Vanessa Countryman
Secretary, Securities and Exchange Commission
100 F. Street, N.E.
Washington, D. C. 20549-0609



I understand that "File 57-24-15" must be listed on this letter. Am sending 3 copies as instructed.

Dear Vanessa and Securities and Exchange Commission:

This letter regards the possible restrictions on ProShares selection of sector investment funds. ProShares is the only brand that I use through E-Trade, but there may be other brands that fit under these possible trading restrictions, other layers of restriction or usage barriers. I have no affiliation or any friend, family member or any contact associated with these funds. I am strongly, strongly opposed to any trading restrictions on these as they are safe and have saved my investment life. Let me explain my situation, which encapsulates why these are such a plus to regular, average-income investors.

My Situation: I had a moderate life savings saved up, but when I my epilepsy became too much and I had to cut back my work dramatically and thus income, I tried multiple investment strategies over the years to earn some income. I tried multiple approaches. I'm not a huge risk taker, so wouldn't invest in small cap stocks, blockchain or similarly risky items. One was trying to invest in riskier but potentially high-ROI NASDAQ stocks. It was a roller coaster ride. These would go way up and down dramatically and Wall Street insiders would have news on individual companies hours to days in advance of small investors. As a result, I would incur the financial penalty or miss out on most of the financial reward. After losing several hundred thousand dollars, I gave up all together for several years, missing all of the 2019 rally. Late in 2019, I started focusing only on ProShares sector funds, which have multiple benefits and slightly higher ROI but not the excessive risk of individual stocks. After success, I now focus on those entirely as a way to earn some income while I battle refractory epilepsy. I am a regular person. Look at my profile on LinkedIn, under Andrew Neff in Belmont CA. You can see my epilepsy work at the bottom.

Why ProShares and Similar Index Funds Work Well For Me and Others and Should Not Be Restricted:

- They are a low risk way to invest on entire sectors. They are somewhat exaggerated in their ROI, but as they're based on entire stock indexes, they are much less risky than single Nasdaq stocks, small caps, blockchain or any other wild but risky investments.
- They are simply based on entire indices and well described, so there's nothing they're hiding. It's more open to small investors than other things as they move in correlation with entire indices.
- I don't need to pay special fees and I'm investing in my own financial judgment vs. some private fund manager who tries to sell me on just how great they are and then charge me a commission.
- As they're based on entire sectors, Wall Street insiders have less of an advantage over small, individual investors like me as I'm investing in an entire index. News impacting the entire market still gets to Wall Street first, which is unfair, but these funds eliminate one form of inequality.
- They are very regular in their movement as they're based on a full index. They are a much safer way to look for slightly higher ROI's on investments than any other approaches I've tried. I have 2 college degrees, 1 in Data Analytics, and I worked on this idea with failure for years...until ProShares.
- With ProShares, as they are only slightly riskier, I don't see the huge, quick ROI that many people want unrealistically. What they do provide is a stable, slightly higher ROI for me on investments.

- I also use them as they are very simple, fast and easy to trade. Restrictions would hurt me dramatically financially and eliminate my current income as this is the only way that I can earn enough to live off of while I have to pay high medical costs for my epilepsy. Placing restrictions on these makes no legal sense to me. If the SEC wants to make investing safe and fair, find ways to restrict Wall Street insiders from getting news first and acting on it, often overnight when others can't. That rationale and high housing costs are the reason that the actual % of people investing in stocks is slowly shrinking.

Please, I beg of you, do not put any restrictions or barriers on these index funds.

I believe that summarizes my case and the multiple reasons why you should not restrict these funds in any way as they are a safe, useful tool for regular investors like me. Please do not share my identity with the general public, but if the SEC needs more from me to better understand the rationale or details, please feel free to mail me a letter and I will contact you and disclose as much information as you need. Address below. Thanks for listening.

Sincerely,



Andrew Neff

Andrew Neff

[Redacted address information]