

October 5, 2011

Securities and Exchange Commission
100 F Street, NE, Washington, DC 20549-1090
Elizabeth M. Murphy,
Secretary,

Ref.: File Number S7-36-11

Dear Ms. Elizabeth M. Murphy,

Following the publication of the “Request for Information”, we hereby kindly submit our comments and reflections with regard to the review of existing regulations by SEC.

We believe the following factors are to be considered when selecting/prioritizing rules for review:

- Relevance – how relevant is the revision of that specific rule to the policy in place?
- Effectiveness – how effective is the process of review? Are there ways to organize the review in a more efficient way?
- Timeliness – the review should be undertaken in a timely manner, it should neither be “a late response” to a market developments, nor a too early effort to resolve a potential problem;
- Goal orientation – a review should always have a clear, predetermined goal,
- Specific areas of implementation – a review should always consider what the rule was originally aimed at (such as consumer protection, financial stability, elimination of abusive market practices, application of lawful accounting and compliant reporting, competition).

We believe the review of regulations should be an ongoing process. The setting of exact dates or timelines might render the review process mechanical. We think the continuous review of regulations should be undertaken as part of an internal quality control mechanism. A unit or a group of employees should be charged with the constant review of regulation as their main function within the regulatory agency.

We believe all information available might be relevant for the regulator when reviewing regulations. The following represents an incomplete list of types of information important for review of regulations:

- Data collected as a result of SEC’s enforcement actions;
- Data provided by market participants (financial institutions);
- Data provided by consumers;
- Data provided by independent experts, academia;
- Data provided by adjacent industries (lawyers, public accountants, rating agencies).

Regarding the improvement of public outreach in the process of review of regulation, we believe the following measure might prove to be useful:

- Raising of awareness in consumers from early age (target high-school and college students);
- Organize public discussions, audiences, panels, conferences, round tables and similar activities with diverse groups, such as:
 - Students;
 - Finance professionals;
 - Lawyers;
 - Consumer groups;
 - Industry groups;
 - Representatives of the judiciary.

Most importantly, the lessons learned from the recent financial crisis should be regarded as an important source for inspiration. We believe this crisis has provided a good insight into the pending issues of the modern financial industry.

And last, but not least, being a diverse group of international students with different backgrounds and legal traditions, we cannot refrain from drawing your attention to the international developments and regulatory tendencies around the world. We believe that the level of the integration of the financial markets today inevitably leads to a certain degree of harmonization in regulatory approaches of different countries.

We would also like to share what our idea of regulation is. We believe Regulation is not a mere compilation of strict rules and regulations, it is the regulator's approach to the industry, a comprehensible, fair and efficient policy, enhanced with tools of implementation such as rules and regulations, as well as guidelines, handbooks and know-how of regulator's staff. Our view is that regulation is more about "principles" rather than "rules". Principles should serve as the anchor for Regulation. Rules should function as one of the several devices of implementing a particular policy.

Furthermore, we believe regulation strives to improve practices in the market and not just insure compliance with rules. While reviewing regulations qualitative analysis should be preferred over quantitative ones. Consequently the goal of regulation review is "better regulation" not "more regulation" or "less regulation".

When answering the questions of the Request for Information we had the abovementioned notion of Regulation in mind.

Sincerely,
Group of Students in
Graduate Program in Banking and Financial Law
Boston University School of Law