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January 24, 2011

The Honorable Mary Schapiro
Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

RE: Release No. 34-63448; File No. SR-BX-2010-059

Dear Chairman Schapiro:

TechNet, the bipartisan policy network that promotes the Innovation Economy wishes to voice its support for the creation of the BX Venture Market on the former Boston Stock Exchange. The capital creation process and the jobs that flow from the growth of small stage companies will be enhanced by the BX Venture Market. This market will benefit a range of technology companies that are struggling in this economy to access capital and create tomorrow's jobs. We are encouraged by the serious controls and regulatory scrutiny for this market that have been proposed by the owner of the BX Venture Market, NASDAQ OMX.

In 1997, the technology industry's leading CEOs created TechNet to shape public policy impacting the high technology industries. TechNet members are Chief Executive Officers and Senior Executives of the nation's leading companies in the fields of information technology, biotechnology, clean technology, venture capital, ecommerce and finance. Today, TechNet is the preeminent bipartisan voice on matters related to the Innovation Economy. Since its inception, TechNet has been committed to advancing public policies and private sector initiatives that make the U.S. the most innovative country in the world. TechNet champions policies that foster a climate for innovation, allowing technology companies to create, thrive and compete.

That is why TechNet supports the establishment of the BX Venture Market. This new market will help drive growth of the economy by allowing for flexible quantitative listing standards but would require companies to comply with many of the qualitative requirements for listing on other securities exchanges. The market will stand as a well-regulated listing alternative for companies that otherwise would transfer to, or remain on, the largely unregulated Pink Sheets or over-the-counter-Bulletin Board, where there are no listing requirements, no public interest review, limited liquidity, and limited transparency. NASDAQ OMX BX has bolstered the filing by requiring listed companies to agree not to claim any state's Boston Stock Exchange-listing exemption for its securities, and stated that it may delist companies that claim an exemption. Additionally, the BX Venture Market will subject companies to the following extra regulatory treatment:

- The Exchange will prohibit listing to any company run by individuals with a disclosable regulatory event in the past five years;
- Brokers that effect transactions in BX listed securities would be subject to compliance with applicable SEC Penny Stock Rules; and
- IPOs on BX are subject to state registration requirements, as well as review by the SEC's Division of Corporation Finance.

Smaller companies need a venue where they can grow and prove their worth to the capital markets. Having a well-regulated exchange listing and trading environment for these companies is the right course to take. We hope you will look favorably on the BX Venture Market filing.

Thank you,

A handwritten signature in blue ink, reading "Rey Ramsey". The signature is fluid and cursive, with a large initial "R" that loops back over the first few letters of the name.

Rey Ramsey
President and CEO
TechNet