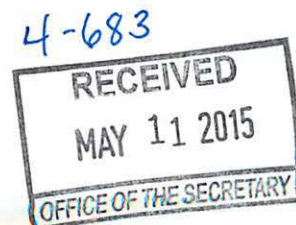


Peter Frank Di Silvio
346 North Idaho Avenue
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May 6, 2015

Mr. Brent Fields
Secretary
U.S. Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549



Re: The Division of Trading and Markets

Dear Mr. Fields,

I respectfully submit this petition to the Securities and Exchange Commission), requesting that the Commission amend Exchange Act Rules 17a-3 and/or 17a4 (17 CFR 240.17a3 and 240.17a-4), which are the rules requiring the registered broker dealers create and maintain certain records.

During the past 25+ years I have worked for the following broker dealers: RBS Markets and International Banking, DB (Deutsche Bank) Securities Services NJ, Inc., CIBC World Markets Corporation, Wall Street Clearing Company, McLeod, Young and Weir Inc. and Swiss American Securities. From my experience regulators and external auditing firms, etc. are not requesting, seeing and reviewing all the pertinent books and records of Broker Dealers, Banks and other financial services companies. For that to occur, the Securities and Exchange Commission, Federal Reserve, FINRA, NASD and external auditing firms, etc. need to require Broker Dealers, Banks and other financial services companies to have the following reports and reconciliations, etc. created, available and subject to review.

It's imperative that this is required to enable the Federal Reserve, the Securities and Exchange Commission, FINRA, NASD and other regulatory agencies and external auditing firms to verify completely that the broker dealer is in compliance with U.S. laws and pertinent regulations, for example, the Dodd-Frank Act, FINRA SEA Rule 15c3-1, FINRA SEA Rule 15c3-3 and the following have all the required information for: Possession or Control, Short Interest reporting, Free Credit balances, Blue Sheet reporting and Federal Reserve requirements, etc. Importantly, this will also allow them to check the Trades, Receive and Deliver, Fail and other transactions on each of the broker dealer's sub-ledgers to see if any Cash and/or Security regulations, Insider Trading, Office of Foreign Asset Control (OFAC) violations, unusual activities or other abuses occurred.

In addition, an extensive audit of each of the firm's Cash and Security sub ledger needs to be required to check to make sure that the Abandoned property laws of the 50 U.S. States, the District of Columbia and Puerto Rico, etc were adhered to and that the stale dated items on each of the firm's Cash and Security sub ledgers were being tracked, reported and escheated on time.

(1) Chart of Accounts for each sub-ledger the firm has and the General (Main) ledger - A listing of the names of the Balance Sheet accounts (assets, liabilities and stockholder's equity) and the Income Statement accounts (revenues, expenses, gains and losses) that a company has for recording transactions on its sub-ledgers and general ledger.

(2) Cash and Security General Ledgers - A complete list of the firm's Cash and Security sub-ledgers.

(3) Sub-ledger to General ledger reconciliations - Daily reconciliations of the sub-ledgers to the general ledger needs to be required to verify that the net balances on all of the firm's Cash and Security sub-ledgers is in agreement with the Cash amounts by currency and the Security positions on the firm's main general ledger. Proof of the investigation(s) of the differences and that appropriate timely action was being taken to document the cause of the differences and resolve them.

(4) Daily Booking Journal - A daily report produced for each general ledger that reflects for each account the Cash and security transactions that occurred that day.

(5) Items off each General Ledger - A list(s) of the items that are off the sub-ledger and general ledger. Proof the items off the sub-ledgers and general ledger were sent to appropriate personnel for their review.

(6) Stock Record Department -

The Stock Record - Required record pursuant to SEC rule 17a-3.

Stock Record breaks - Proof of the timely resolution of each exception.

(7) Daily Stock Record - A daily Stock record produced for each security ledger that shows the Buy and Sell and Receive and Delivery (R&D) and other transactions, etc by account for each security by cusip or other security number that had activity, transactions that day. Many firms only have a Consolidated Stock Record which only shows the accounts holding positions for each security at the end of each business day.

(8) Possession or Control -Related to SEC rule 15c3-3 - The Customer Protection Rule, which prohibits a brokerage firm from commingling fully paid for customer securities with non-fully paid for customer securities and/or firm securities. Daily copies of the broker dealers Unaccomplished Segregations reports that identifies any 'SEG Violations' committed by the firm. Documentation showing that the firm took action (within the specified amount of time) to rectify any SEG Violations. Evidence of those instance(s) where a delivery out of the firm caused a Segregation violation and the corrective action the firm took so it wouldn't happen again.

(9) Revisions to the Unaccomplished Segregation Reports - Documentation showing the Stock Record department monitored and adjusted all segregation deficit positions resulting from foreign depository positions not equaling what's in the respective depository's account on the main general ledger. In many instances, the client's seg memos need to be updated to lock up the required quantity of shares that are fully paid for. Seg deficits could be missed if this isn't done.

If the Commission or the staff have any questions, or wish to discuss any of these matters in greater detail, please do not hesitate to contact me at (516) 527-8380 or disilpdpjc@aol.com.

Thanks.

Best Regards,

Peter F DiSilvio

Peter F DiSilvio

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