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August 24, 2004

Mr. Jonathan Katz
Secretary
United States Securities and Exchange Commission
450 5th Street, N.W.
Washington, DC 20449

RE: Rule-Making Proposal No. 4-483

Dear Mr. Katz:

This letter is in support of the "Request for Rulemaking under Section 12(g)(5) of the Securities Exchange Act of 1934 concerning securities held in Street Name" (Rule-Making Petition 4-483). I believe there is a vital need to change the requirements for the deregistration of a security.

Crystal Equity Research is a new research resource on small capitalization companies. However, I have been involved with small capitalization companies both as a research analyst and as an investment banker for over fifteen years. Many of those companies are listed on the Over the Counter Bulletin Board. In addition I am a member of the New York Society of Security Analysts, Committee on Corporate Reporting, through which we endeavor to educate and promote transparency and fairness in public company reporting.

In my view, the Commission should act for greater disclosure and accountability by public companies in its entire rule making efforts. In the particular cases outlined in Petition 4-483, it is clear some companies are taking advantage of decrepit rules and procedures to hide from public scrutiny and avoid the consequences of shareholder dissatisfaction. To those provided by Mr. Nelson in his petition, I could add examples from my own experiences in which small, very promising public companies raised capital in the public markets only to fall short of their business objectives. Rule 12g5-1 provided an unintended escape hatch for management that should have worked harder to find better solutions such as striking agreements with acquirers, liquidating assets, or other mitigating actions. Instead management hid from investors and in one case left shareholders without so much as a forwarding address to locate those assets shown on the last public balance sheet. Management appeared to have literally run away in the dark of night.

The basis for counting and categorizing stakeholders should be brought into line with current securities practices and record keeping capabilities. While the brokerage community may chafe at the change in procedures, the value of public disclosure in promoting fairness in the capital markets far outweighs any additional administrative burden a broker dealer might bear. The advance of technology often renders obsolete established business practice. Eventually those processes are modernized in order to reap the benefits of greater efficiency. In this case the potential benefits are adequate information and disclosure for the public shareholder and fairness in the capital markets.

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The Commission has been a champion for the public shareholder in many of its recent actions. I urge the Commission to continue this cause by acting favorably on Rule-Making Petition 4-483. Thank you in advance for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Debra Fiakas".

Debra Fiakas, CFA
Managing Director