

Key Equity Investors, Inc.
63-54 82nd Place
Middle Village, NY 11379
September 19, 2005

Mr. Jonathan G. Katz
Secretary
U.S. Securities and Exchange Commission
450 Fifth Street, NW
Washington, DC 20549

Re: Rule-Making Petition 4-483

Dear Mr. Katz:

We are again writing to express our strong support for 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). In addition, we respectfully ask the Commission to expedite the process of changing the current rule. Unfortunately, as the Commission goes through the process of considering the rule change, more companies continue to exploit the current loophole. We hope that once the rule change is implemented these companies will be forced to re-register.

This week Chairman Cox is expected to delay Sarbanes Oxley internal control compliance for small companies an additional year. We believe this represents a positive step which may delay Form 15 filings for some companies, but it is obviously not the solution to the problem.

We would like to provide another example of how catastrophic deregistration is for small investors. On April 29, 2005, without any warning, JLM Couture, Inc. (JLMC) filed a Form 15 with the SEC. Again a company with beneficial holders significantly exceeding 300 deregistered. Since that date public shareholders have received absolutely no information on the performance or the condition of the company. During this period the stock priced has plunged, outside shareholders have lost the protection of the Securities Laws, the shares have become illiquid and outside shareholders have been left totally in the dark. How can the Commission allow this to continue?

Investors buy securities with the explicit expectation that they will be provided protection by the Federal Securities Laws. Allowing companies to simply *choose not to comply* with the law by taking advantage of a technicality is certainly not the intent of the legislation. We again urge the Commission to move quickly to change the rule.

Sincerely,

Anthony Chiarenza

