



May 4, 2005

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

Dear Mr. Katz:

I am writing on behalf of the employees and investors of HouseRaising, Inc. ("HRAI") as well as myself in reference to SEC File No. 4-500 Request for Rulemaking Regarding Member Records of "Short" Positions and Reporting and Public Dissemination of Aggregate Positions by Security.

Like numerous others, I believe there is a crisis facing the OTC market today in the lack of short sale position reporting and disclosure for OTC issues. This lack of transparency regarding short selling in the OTC market allows fraudulent acts to go undiscovered and manipulative short sellers to hide.

Therefore, I am asking that the SEC amend NASD Rule 3360 and require NASD broker dealers to maintain a record of total "short" positions in all customer and proprietary firm accounts in all publicly traded equity securities as well as report this information to the NASD for public dissemination of the short positions by security. This rule change is a necessary improvement to the OTC markets. Without it, our company, our shareholders and securities regulators are blind to any short selling activity in HRAI stock. The amendment is needed to insure HRAI and all OTC stocks are traded in transparent, efficient and well-regulated markets as opposed to the current environment that is tarnished by the threat of manipulation.

Thank you for your attention to this matter and for extending the same transparency and regulatory oversight of short selling found for securities listed on Exchanges and NASDAQ to the OTC market.

Sincerely,

Charles M. Skibo  
Chairman & CEO

cc: Barbara Z. Sweeney