

May 28, 2024

Vanessa A. Countryman
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

VIA ELECTRONIC MAIL
rule-comments@sec.gov

Subject: Petition for Rulemaking – 13(f) Modernization (File No. 4-825)

Dear Ms. Countryman:

I appreciate the opportunity to comment on the Petition for Rulemaking filed by the Society for Corporate Governance, the National Investor Relations Institute, and the New York Stock Exchange on April 19, 2024. This Petition requests that the Securities and Exchange Commission (SEC) initiate a rulemaking to modernize Section 13(f) of the Securities Exchange Act of 1934.

Form 13F filings are required on a quarterly basis and are allowed to be submitted to the SEC as long as 45 calendar days after the end of each quarter. A 45-day disclosure window after the end of each calendar quarter does not permit market participants to receive accurate information in a timely manner about the equity positions of large investment managers.

The SEC should initiate a rulemaking to modernize its 13(f) rules and, at the very least, accelerate the timetable for quarterly disclosures from 45 calendar days to 5 business days, as the Society-NIRI-NYSE Petition for Rulemaking advocates.

Sincerely,

Adam Uhlman

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Head of Investor Relations

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