



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

805 15th Street, NW, Suite 708, Washington, D.C. 20005
Telephone 202.650.5100 | Fax 202.650.5118
www.technet.org | @TechNetUpdate

VIA ELECTRONIC MAIL

April 29, 2020

Ms. Vanessa Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

**Re: Proposed Rule on Market Data Infrastructure (Release No. 34-88216;
File No. S7-03-30, RIN 3235-AM61)**

Dear Ms. Countryman:

On behalf of our member companies, TechNet respectfully requests that the Securities and Exchange Commission ("SEC" or "Commission") extend the May 26, 2020 deadline for the public to comment on the SEC's Proposed Rule on Market Data Infrastructure,¹ or that the Commission otherwise pause the rulemaking altogether during the pendency of the COVID-19 pandemic.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating for a targeted policy agenda. Our diverse membership includes dynamic American businesses ranging from startups to the nation's leading technology companies and represents more than three million employees and countless customers in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, cybersecurity, venture capital, and finance.

Specifically, our member companies are issuers of some of the most widely-traded stocks in the world. For such members, this Proposed Rule would have profound effects on the manner in which their stocks trade in the U.S. equities markets. While TechNet and our members may indeed wish to comment on the Proposed Rule, we, along with many of our members, simply lack the capacity to do so at this time given the stark reality of the current economic environment.

¹ See Securities Exchange Act Release No. 34-88216 (February 14, 2020), 85 FR 16726 (March 24, 2020) (the "Proposed Rule").

Like most industries at this moment, the tech industry has been roiled by the COVID-pandemic and the havoc it has wrought upon their businesses and the health and welfare of their employees. For many TechNet members, especially those with employees deemed essential under guidelines issued by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA) guidance intended to support state, local, and industry partners, all available resources have been allocated to surviving and managing through the pandemic. Little or no excess capacity exists to attend to other matters at this time – even those as important as commenting on the Proposed Rule.

Accordingly, TechNet asks that the Commission extend its public comment period so that TechNet's members, and indeed all issuers, will have a fair opportunity to provide thoughtful input into the Proposed Rule, which will ultimately be vital to the success of the Proposed Rule. TechNet urges the Commission to do what is necessary to ensure that issuer voices on this critical topic are not silenced unnecessarily as a result of this once in a lifetime public health crisis affecting our nation and the entire globe. Thank you for considering these comments, and we look forward to working with you.

Sincerely,

A handwritten signature in blue ink that reads "Linda Moore". The signature is written in a cursive, flowing style.

Linda Moore
TechNet President and CEO