Gene L. Finn
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Mary L Shapiro, Chairman
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549 RE: S7-08-07
June 25, 2012

Dear Chairman Shapiro

A recent trading experience prompts me to request that the Commission revisit SEC rules that require T+3 settlement of stock transactions in cash customer accounts, especially as they apply to customer trades executed as principal by the executing and clearing broker on a fully disclosed basis.

Clearing of such customer trades does not occur in the continuous net-by-net clearing and settlement process. Principal-customer trades are locked-in in seconds with no failed transactions even possible. In comparison, The Commission has required mutual funds to have T+1 settlement for customer trades for decades.

T+3 allows an executing broker (acting as principal) to hold customer cash for an extra two full days, unnecessarily depriving the customer of access to those funds and exposing the customer to transactions' risks associated with having his funds held by a marketmaker, as opposed to a money market mutual fund or a bank.

Cash or cash-equivalent is required in cash accounts before transacting is permitted. Therefore, T+1 would seem to be the maximum time required between execution and settlement of principal-customer trades. Indeed same day settlement would seem easily achievable for such trades.

In this instance, when we sought to move cash from an executing/clearing firm customer cash brokerage account to the designated sweep account for the cash account, we were advised that the cash credit in the cash brokerage account could not be transferred to the sweep account until T+3, because of government regulations requiring T+3 settlement.

All that happened between the close of business on trade date and T+3 was that the customer lost use of the money and/or interest income and was exposed to 2 days risk unnecessarily. The executing broker, whose interests conflict with those of the customer, gained interest income from use of the customer free credit balances.

The government, by requiring T+3, is increasing, unnecessarily, the transactions' risks and transactions' costs of cash account customers by artificially preventing prompt transmission of cash account customers' funds. The mandate of The Commission to remove unnecessary impediments to the efficient working of the National Market System and indeed the all encompassing mandate to protect investors both argue for a careful look at the negative effects of T+3 on retail investors.*

Respectfully yours

Gene L. Finn