

October 8th, 2022

Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: Reporting of Securities Loans (File No. S7-18-21)

Dear Secretary Countryman:

I am writing in strong support of rule 10c-1, "Reporting of Securities Loans".

I 100% explicitly support transaction-by-transaction reporting. Aggregate reporting is NOT transparent and not enough. I really want to see 15 minute reporting and the cost and effort are worth stopping fraud. Short selling in the dark prevents companies from being able to protect themselves from predatory short sellers. How can this not be a good thing? The SEC is supposed to protect investors...short selling does the opposite. It can take money basically out of the pocket of retail investors for the benefit of bad actors.

The Commission, in proposed rule 13f-2, explicitly noted its awareness of the myriad ways in which short selling can be used to abuse individual investors and working families. In proposed rule 13f-2, the Commission said it is "...mindful of concerns that certain short selling activity can be carried out pursuant to potentially abusive or manipulative schemes. For instance, market manipulators may seek to spread false information about an issuer whose stock they sold short in order to profit from a resulting decline in the stock's price. The Commission has previously noted various other forms of manipulation that can be advanced by short sellers to illegally manipulate stock prices, such as 'bear raids.

Sincerely,

Chris Eckenrode