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 believe this rule is a Responsive and innovative in the face of significant market developments and trends in the wake of the 2008 financial crisis

To begin, a short seller is not an investor, but the opposite, and a rejection of rule 10c-1 would signal the SEC's prioritization of hedge fund comfort and profiteering over investor protection and market transparency. While short sellers might be afraid of 'short squeezes' that can follow the identification of their short-selling strategy, that is not a reason for the Commission to decide against greater transparency. If short selling is diminished through this transparency, then short squeezes and dangerous volatility becomes less common. Informed investors will quickly learn to avoid positions that could result in such dangerous volatility, which will benefit the overall market. The transparent disclosure of lending inventory and near-real-time position reporting will only make it possible for broker-dealers to discriminate against companies that are already bearing an onslaught of phantom shares in capital markets. Companies targeted by naked short selling deserve a greater ability to defend themselves against predatory strategies and algorithms. The timely detection of fraudulent and abusive activity comes before Wall Street profiteering that works against economic growth and job creation.

Importantly, Main Street will have a much better idea of the risks of our decisions and transactions if we can see which companies are targeted and implementing rule 10c-1 aligns with the SEC's strategic plan to put working families first. More timely reporting allows for more timely reactions; slower reporting prevents retail investors and working families from protecting themselves from abusive short-selling practices. Working families do not have the resources to buy data and analysis, especially with the foresight attained through PFOF, nor do they have the time to analyze data themselves. The Commission must not behave as though they are ignorant of how greater data provision empowers whistleblowers and public data sharing, who extend the Commission's reach and greater empower it to meet its strategic goals and empower Main Street.

The enactment of rule 10c-1 will fortify the US's economic stability and diminish the inherent danger of untracked lending chains that can lead to economic fragility and create Idiosyncratic risk, that puts America's financial institutions, national security, and dollar world reserve currency status at risk. Once again, putting the agency's failure to regulate the financial industry on the back of workings Americans, the same retail investors that many of these large private investment funds have profiteered from through the strategy of short selling and securities swaps. There can never be a 'fair' market to protect as long as multiple markets exist for institutions compared to the Main Street investors the SEC was founded to protect, and it is a dereliction of duty and responsibility of the agency. Short selling in opaque and inaccessible secondary markets harms true competition and price discovery, two pillars of the capitalist economic system. I support transaction-by-transaction reporting as outlined in rule 10c-1 because it eliminates the ability to hide within the aggregate, and I believe transparency means transparency and aggregates delayed reporting is not transparent or useful in today's highly leveraged and algorithm-driven stock market.

Finally, when brokers lend the shares being held for retail investors, it is equivalent to replacing the bought and paid-for shares with an IOU. Securities lending ignores the investor's right to vote in matters of corporate governance and to receive tax-qualified dividends. Further, a fail-to-deliver (FTD) that is "closed" with a borrowed share is not really closed and leaves open that IOU with the lender. Therefore, securities lending harms market efficiency by inflating the number of shares in circulation, which also hampers true price discovery by artificially increasing supply. For the sake of the U.S. Securities and Exchange Commission to meet the original purpose the agency was founded in 1934, it is imperative that rule 10c-1 be implemented and upheld equally across all financial entities trading and overseeing these assets. Failure to do so will further erode public trust in the institution and its intentions.

Sincerely,

A Concerned Investor