

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".

Let me start off by saying that without this ruling secret short-selling could be used to profit off of true investors instead of funds being used for the purpose of actual investing. As short-selling is the exact opposite of an investor. This is supported in rule 13f-2 where "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.'"

Retail will benefit from increased transparency as-well as victimized companies. Victimized companies need a greater ability to defend themselves against predators just as much as retail investors do, which include everyday working families. The last thing anyone wants is for retail investors to be used in the name of increasing hedge fund returns.

This ruling will also benefit the market as a whole as the seemingly new and desirable phenomenon of the public serving as front-line watchdogs in monitoring short selling data for securities fraud, strengthening the SEC and better enabling it to fulfill its mandate, at no extra cost. The Commission most not behave as though they are ignorant of how greater data provision empowers whistleblowers, which extend the Commission's reach and greater empower it to meet its strategic goals.

The dangers inherent in long, untracked lending chains can lead to economic fragility. Secret securities lending can hide massively destructive chains which can even be a threat to national security as a whole.

Overall, I once again explicitly express my support for the ruling as a whole. Transaction-by-transaction reporting eliminates the ability to "hide within the aggregate"; transparency means transparency and aggregates are not transparent at all. That being said, all costs that may arrive from the 15-minute reporting requirement are fully justified as they prevent fraud and also prevent hiding in loopholes. Transparency is as important as it's ever been.

Sincerely,  
A Concerned Investor