October 29, 2022

By Email

Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 205499–1090
rule-comments@sec.gov

Re: Reporting of Securities Loans (Release No. 34-93613; File No. S7-18-21)

Ms. Countryman:

I appreciate the opportunity to comment on the U.S. Securities and Exchange Commission's (the "SEC" or "Commission") proposed rule to increase the transparency and efficiency of the securities lending market. I explicitly support the 15-minute reporting requirement, as the cost and effort are justified to prevent fraud and prevent hiding in loopholes and I fully support this rule for the following reasons:

- Retail investors benefit from increased transparency: Investors have a much better idea of the risks involved if we can see which companies are being targeted by predatory short selling. If funds are allowed to short in the dark, retail investors remain dangerously unaware of the risks they take on when purchasing securities. More timely reporting allows for more timely reactions; slower reporting prevents retail investors and working families from protecting themselves from abusive and predatory short selling practices. Working families and the individual investors need to be able to look both ways before they cross Wall Street.
- Security Lending in the dark can lead to economic fragility: Securities lending activity can hide massively destructive chains of obligation that can even be a threat to national security, and so transparency in this area is more important than it has ever been. The risks associated with reckless securities lending and short selling - highlighted with terrifying clarity following the events of Jan 28 2021, go far beyond any theoretical benefits of secret short selling for "superior returns". Investor protection comes first.
- Public watchdogs: The general investing public can assist the SEC in being first-line watchdogs in monitoring short selling data for securities fraud, strengthening the SEC and better enabling it to fulfill its mandate, at no cost. More timely, higher-resolution reporting would create a waterfall effect whereby some individual investors analyze the data and make that analysis publicly available for free, which is then disseminated widely and re-analyzed, spurring more activity. This allows individual investors to help each other, and allows busy working families to be the recipient of aid for free. Working families do not have the resources to buy data and analysis, nor do they have the time to analyze data themselves. Greater transparency has positive effects

on investor protection that go far beyond the obvious. The Commission must not remain ignorant of how social media facilitates a protective web of information sharing that protects investors. The Commission must not behave as though they are ignorant of how greater data provision empowers whistleblowers, who extend the Commission's reach and greater empower it to meet its strategic goals.

I hope to see more rules like this in the future, promoting further transparency and I humbly ask for this rule to be finalized as soon as possible.

Thank you,
Jared Chuba