

Vanessa A. Countryman, Secretary  
U.S. Securities and Exchange Commission  
Via Online Comment Portal  
Re: Reopening of Comment Period for Position Reporting of Large Security-Based Swap  
Positions S7-32-10

I strongly support this proposal and praise the effort in preventing evasion of the reporting rule.

I strongly support transparency and the PUBLIC disclosure of this data.

I am concerned that excessively large swaps are a threat to financial and national stability. Please look into Archegos Capital Management and other potential hidden “lurking bombs” that need to be revealed as soon as possible.

I hope to see more rules like this in future.

I request that the threshold be lowered to \$100 million / \$200 million gross. While the rule prohibits things like spreading a large swap position out to evade the threshold, this will be done and the SEC may or may not be in a position to detect it. By providing the public with more data, and slightly lowering the threshold, more of this fraud may be detected. It is important that the rule be hardened against evasion (e.g. by multiple actors colluding to build a large position through separately acquiring smaller positions that evade reporting requirements). We do not want to see the rule watered down in practice.

I also support applying this rule internationally so funds and firms cannot use borders to evade the rules of the market.

I suggest looking at the entire swap portfolio to determine reporting requirements, not just parts: “The Commission should follow the precedent in Rule 13h-1, which identifies “large traders” using the trader’s entire position in all National Market System securities. The overall picture of a trader’s appetite for excessive risk can only be formed by looking at their total swap position. Allowing large traders to take on excessive risk via swaps in many different individual securities while avoiding reporting requirements is against the spirit of the rule and goes against the Commission’s prior rulemaking.

The Security-Based Swap Position includes all security-based swaps based on the same underlying security or reference entity, regardless of whether they are debt (including CDS) or equity-based, so that funds and firms cannot evade reporting requirements by using different types of complex financial instruments.

I agree with the definition of security-based swaps and it must be appropriately wide to minimize evasion.

I agree with daily reporting and praise the Commission's public release of the data. It empowers citizens to protect themselves from excessive risk and the companies they own from hostile actors. "The Commission should absolutely utilize its authority under Section 10B(d) of the Exchange Act to publicly release data. Fraud is widespread, and the resources of the SEC are limited. By allowing the People to see potentially dangerous swap activity, they will be better able to assess the investments they make and observe the dynamics of the market. A more level playing field is absolutely in the public interest, and the damage that can be done via swap activity (e.g., Archegos) necessitates that investors be equipped to defend themselves and the markets they use.

The SEC should finalize this rule ASAP.

Best Regards,

Dr. Paul Pritchard