



The American Chamber of Commerce in South China

National Headquarters and Conference Center
AmCham Tower
Suite 1801, Guangzhou International Sourcing Center, No.8 East Pazhou Avenue,
Haizhu District Guangzhou, Guangdong, PRC 510335
Tel: 86-20-8335-1476 Fax: 86-20-8332-1642
华南美国商会中国总部及会议中心
美国商会塔
中国广东省广州市海珠区琶洲大道东路8号 广州国际采购中心 1801室 (510335)
电话: 86-20-8335-1476 传真: 86-20-8332-1642

Brent Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: SEC file No. SR-CHX-2016-20, Release No. 34-79474

Comment Letter to the proposed transaction involving CHX Holdings, Inc. and North America Casin Holdings, Inc.

Dear Secretary Fields,

As an American citizen and President of the American Chamber of Commerce in South China (AmCham South China), I would like to submit this letter to express some personal thoughts on the proposed acquisition involving CHX Holdings, Inc. and North America Casin Holdings. AmCham South China is a non-partisan, non-profit organization dedicated to facilitating bilateral trade between the United States and the People's Republic of China. Certified in 1995 by the U.S. Chamber of Commerce in Washington, D. C., it represents more than 2,300 corporate and individual members.

Based on my long-term experience on promoting business network in the United States and China, I believe the proposed transaction will make CHX an important bridge between capital markets in US and China. Connecting US and Chinese stock markets would allow the US to benefit further from China's growth.

The United States is now the first choice of tens of thousands of Chinese companies seeking to diversify their assets through overseas investment. If America keeps shutting doors to investors from China, and disheartened Chinese business owners might probably turn away from the US and divert their attention to the UK, Australia and our neighbor Canada. Instead of simply retreating from international cooperation and investment and further dismantling US-China economic ties, the new administration should think its approach to Chinese capital and encourage Chinese companies to show greater openness and transparency in its overseas investment.

Exchanges and financial centers in other regions are already pushing at China's door as it seeks to diversify its economy and offering a potentially wider range of opportunities. A direct link has been operated between the Hong Kong and Shanghai exchanges since November 2014, which allows international investors to trade stocks on Shanghai's tightly restricted exchange and lets Chinese investors buy shares outside of the mainland China for



The American Chamber of Commerce in South China

National Headquarters and Conference Center
AmCham Tower
Suite 1801, Guangzhou International Sourcing Center, No.8 East Pazhou Avenue,
Haizhu District Guangzhou, Guangdong, PRC 510335
Tel: 86-20 - 8335-1476 Fax: 86-20 - 8332-1642
华南美国商会中国总部及会议中心
美国商会塔
中国广东省广州市海珠区琶洲大道东路 8 号 广州国际采购中心 1801 室 (510335)
电话: 86-20 - 8335-1476 传真: 86-20 - 8332-1642

the first time. On the same day in 2016 that Britain announced a proposed London-Shanghai trading link, Euronext announced a partnership with the same Chinese exchange to “enhance the promotion and marketing of its cash, derivatives, commodities and index data” in China. Deutsche Börse is also enlarging its footprint in Asia, and the CME has signed an agreement with the China Financial Futures Exchange on data distribution.

The proposed transaction would create a possibility for a US stock exchange to establish the same type of connect. CHX is a niche player in the U.S. equities market, which makes it a low cost solution for the pilot program. The creation of a direct trading link would open up a major trade route to US capital markets for companies operating in the world's fastest growing economy.

All in all, a thorough examination is indeed necessary to protect investors and promote a fair and transparent capital market. But if the regulators have done their job and find nothing to worry about, we should keep a welcoming attitude to foreign investment.

Thank you for your review.

Yours Sincerely,



President
The American Chamber of Commerce in South China