

From: [REDACTED]
To: [Comments, Public](#)
Subject: Comment on Regulatory Notice 21-19
Date: Wednesday, July 7, 2021 10:59:21 PM

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To Whom It May Concern,

Regarding the Proprietary and Customer Account Categorization, I support specifying short interest held across proprietary accounts and customer accounts for each equity security as of the close of the reporting settlement data. As a logical extension, I recommend requiring short interest held in EACH proprietary account and customer account for each equity security, and the duration of the short interest position. This should be done in a de-identified manner as a report to FINRA, but the mapping should be retained by firms so that FINRA can effectively regulate short interest positions on a proprietary and customer account basis-including threshold security equities.

Regarding the Account-level Position Information, I support FINRA requiring firms to report short interest position information at the account level for all equity securities. I further suggest requiring short interest duration reporting for each account for each equity security.

Regarding Synthetic Short Positions, I support requiring firms to reflect synthetic short positions in short interest reports. I also suggest FINRA report the synthetic short positions in publicly available short interest data.

Regarding Loan Obligations Resulting for Arranged Financing, I support FINRA's proposal.

Regarding Total Shares Outstanding and Public Float, I support FINRA's proposal.

Regarding Threshold Security Field, I support FINRA's proposal.

Regarding Frequency and Timing of Short Interest Position Reporting and Data Dissemination, I recommend requiring daily reports, daily reports to the public, and weekly reconciliation of data.

Regarding Information on Allocations of Fail-To-Deliver (FTD) Positions, I support daily information reporting to FINRA.

I also recommend reporting to the public the mean and median duration of FTD and short interest positions on each equity security on a daily basis.

Sincerely,
[REDACTED]