

From: [Simon Goddard](#)
To: [Comments, Public](#)
Subject: Regulatory Notice 21-19 - Short Interest Position Reporting Public Comment
Date: Sunday, July 25, 2021 8:53:23 AM

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Dear sir/madam,

Please find below some generalised points from the perspective of myself, a retail investor regarding public comment of Regulatory Notice 21-19 - Short Interest Position Reporting.

Although my views may be considered skewed, I still feel changes need to be made for a fair and better market for all.

- Free short sale information – no paywalls
- Real time short sale and FTD data – accurate, up-to-date and daily settlement data
- Better dissemination of short sale information – disseminate between short sales, naked short sales, synthetic positions and those still on loan compared to those sold short
- Real time OTC and ATS data – accurate, up-to-date and daily dissemination of OTC and especially Dark Pool data
- Better Off Exchange, OTC and ATS/Dark Pool regulations – current regulations leave the retail investor at a huge disadvantage and increases the likelihood of abuse by institutions/market professionals of these facilities, more emphasis on routing retail orders through lit exchanges
- Short sale position close out date – there seems to be no timeline for short sellers to close out their short positions and FTD's
- Better and more aggressive enforcement of short sale regulations – from a retail perspective the enforcement of bad actors seems to go largely unchecked, especially with large institutions
- Better punitive measures – the current measures are laughable compared to the damage done by bad actors, end of 'drop in the ocean' fines resulting in 'cost of doing business' practices
- Better accumulative punitive measures – persistent abuse around short sale regulations to be met with stronger and stronger punitive measures

Kind regards,

Simon Goddard