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To: [Comments, Public](#)
Subject: FINRA SHORT SALE REPORTING COMMENTS
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First and foremost nothing any of us will say will matter if rules are not being enforced. That should be the MAIN thing that gets worked on. Participants move around the rules with little to no repercussions as you can see now. SI reported positions should be reported t+0, otherwise it's not fair at all and we're always t+2 days behind on what the actual SI is. The reporting period should be daily. Some ideas I have include.

1. Reducing the reporting period to daily...from biweekly.
2. Require that exchanges report failures to deliver and naked shorts alongside covered shorts.
 - I understand that naked shorting is illegal but that doesn't mean it's not going on. Please don't ignore this.
3. Reduce the holding period for reported days from 4 days to 2 or fewer.
4. Document and release the identities of funds that have open short positions and their sizes. This would operate similarly to the way longs and options are currently reported.
5. Regularly audit the reported positions to ensure the self reporting is accurate and fine (or penalize) entities that misreport. This would include going deep to ensure that no shorts are being hidden in long options contracts, or mislabeled as long positions.
 - Understand that with self reporting with auditing can lead to inaccurate self reporting.

Along with these I will say again that it means nothing if rules are not enforced. I appreciate you taking the time to read this and PLEASE consider any or all of the ideas I brought forth today. Thank you.