

To FINRA:

The proposed Rule 2030 definition of "rumor" *i.e.*, "a false or misleading statement or a statement without a reasonable basis" has almost no connection to its English language definition of "general talk not based on definite knowledge", and utterly falls apart if the general talk turns out to be true.

A false or misleading statement is a lie, not a rumor. False and misleading statements are already proscribed by Section 10(b) of the 1934 Exchange Act (as well as Rule 10b-5 promulgated under it), among other related statutes, rules, regulations and common law principles.

Many rumors have a reasonable basis, and examples abound. Apple's Steve Jobs was *rumored* to be ill for a long time. And lo and behold, he just had a liver transplant. Defining rumor as a statement *lacking* a reasonable basis describes something that is covered already by the anti-fraud provisions of the federal securities laws.

As the definition is now proposed, it would therefore seem that if a rumor turns out to be true, or if it has a reasonable basis (and I see a bigger problem with the scope of the phrase "reasonable basis"), it would be all right to circulate it or to trade upon it.

By altering the standard definition of "rumor", you remove clarity, add confusion and promote litigation. There is a reason that there has been a "plain language" movement in the law for the past few decades. Setting it back serves no useful purpose, other than to enrich lawyers. Oh, wait, now I see. Never mind.

Respectfully submitted

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