

From: [REDACTED]
To: [Comments, Public](#)
Subject: [EXTERNAL-WEB] Rule 6730 Amendment
Date: Thursday, September 22, 2022 11:26:10 AM

Date: 09/22/2022 11:26 AM

First Name: Riggín

Last Name: Dapena

Email: [REDACTED]

FINTA determined that 81.9 percent of trades in the TRACE-Eligible Securities that are currently subject to the 15-minute outer limit reporting timeframe were reported within one minute of execution. CGIS, a small B/D, is part of the other 18.1% that would have to spend an inordinate amount of capital to comply with the proposal. We consider this onerous and discriminatory as we do not have the resources that bigger firms have. We would like to know if further analysis on your part demonstrates that this measure impacts negatively 80% of the B/Ds in your universe.
