June 20, 2005



Jonathan G. Katz Secretary, Securities Exchange Commission 450 Fifth Street, N.W. Washington, DC 20549

RE: SEC File No. 4-500. Request for Rulemaking Regarding Member Records of "Short" Positions and Reporting and Public Dissemination of Aggregate Positions by Security.

## Dear Mr. Katz:

I am writing to request your assistance in making a change that will allow start up companies to have a chance in the marketplace and allow investors an opportunity that is currently being denied due the policies and procedures that seem acceptable in today's marketplace.

Please amend NASD Rule 3360 and require NASD broker dealers to maintain a record of total "short" positions in all customer and proprietary firm accounts in all publicly traded equity securities as well as report this information to the NASD for public dissemination of the short positions by security. The SEC's action is urgently needed to prevent fraudulent acts, expose market manipulation, promote fair principles of trade and protect investors.

Without this rule change, investors and securities regulators will be blind to any short selling activity in Pink Sheets and OTCBB stocks. You, the SEC, need to know that the lack of short sale information in your securities is unacceptable and we the people, demand the change to NASD Rule 3360 immediately

Your attention and assistance in this matter is much appreciated.

Sincerely,

Wayne Radelyff Wayne Radcliffe 3426 Stephan Road Racine, WI 53402

CC: Barbara Z. Sweeney

Senior Vice President & Corporate Secretary, NASD

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