May 16, 2005

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

I am writing to ask for your much needed help. Please approve the Pink Sheets petition to cause the amendment of 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.

It is important that the SEC moves to prevent fraudulent acts, expose market manipulation, promote fair principles of trade and protect investors. It is my belief that protection of these investors should be the primary goal of the SEC.

Thank you very much.

Dan Rooney