



May 31, 2005

Via Email

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

**Subject: 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

The SEC's action is urgently needed to prevent fraudulent acts, expose market manipulation, promote fair principles of trade and protect investors. Therefore, my company supports the amendment of NASD Rule 3360 that requires 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.

Sincerely,

*Michael D. Heilman*

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