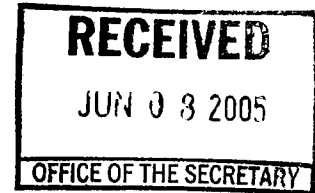


June 2, 2005



Mr. Jonathan G. Katz
Secretary
Securities & Exchange Commission
450 Fifth Street, NW
Washington, D.C. 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:

As Chief Financial Officer of a company traded on the Bulletin Board I am writing you to request that SEC File No. 4-500 Request for Rulemaking Regarding Member Records of "Short" Positions and Reporting and Public Dissemination of Aggregate Positions by Security be implemented. Smaller companies such as ourselves need to know information regarding the short selling of our stock. Therefore, we request that NASD Rule 3360 be changed.

To maintain the integrity of the markets we need to know if such short selling is occurring in our stock and the magnitude of such short selling.

Thank you in advance for your consideration of this matter.

Sincerely,

Todd B. Fortier
Chief Financial Officer

cc: Barbara Z. Sweeney, Senior VP & Corporate Secretary NASD
John Regan CEO-PDG Environmental, Inc.