

May 19, 2005

To whom it may concern:

Please amend 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. Investors deserve this transparency and it is desperately needed to restore confidence in our markets. Investors have been taken advantage of for years while regulators failed to address this issue. You have the opportunity to do the right thing now, please do so.

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