

June 17, 2008

To SEC,

I want the SEC to adopt New Rule 15c3-4 to Address the Practice of Market Participants Redefining Securities in Customer Accounts Past T+3. The SEC must peruse perfect mechanism for accurate trade settlement according to section 17A of the Securities Exchange Act of 1934.

To allow that industry participants may issue "securities entitlements" in place of securities not delivered past T+3, violates section 17A which states that the SEC in its oversight of national clearing must peruse perfect mechanism for prompt and accurate trade settlement. That allowance changes the definition of "security" as defined in federal securities law.

Nowhere does section 17A allow for prompt OR accurate trade settlement. One is not allowed to be sacrificed for the other.

The section clearly states "prompt and accurate " trade settlement.. It is the SEC's responsibility to see that the letter of federal securities law is adhered to. You are violating your duty to protect investors and maintain fair and honest markets as you allow "security entitlements" to replace any "security" in customer accounts.

Please adopt New Rule 15c3-4.

Thank You,

C. Rice
US Citizen and investor