



THE
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September 4, 2007

Office of Management and Budget
Attention: Desk Officer for the Securities and Exchange Commission
Office of Information and Regulatory Affairs
Washington, DC 20503

Re: File Number S7-11-07

Dear Sir or Madame:

The Washington Service is the leading provider of Form 4 and Form 144 information to the institutional marketplace. As the paid contributor of Form 144 data on the three major financial news services (Dow Jones, Bloomberg and Reuters), we reach over 450,000 desktops. Additionally, we have over 30 years of experience in working with the market participants who utilize the Form 4 and Form 144 data as part of their investment and capital formation processes. Worldwide, we have over 200 major financial institutions as clients. We deal directly with buy and sell-side analysts, portfolio managers, investment bankers, and traders. The breadth of our distribution and our years of experience uniquely position us to comment on the value of Form 144 information in the market

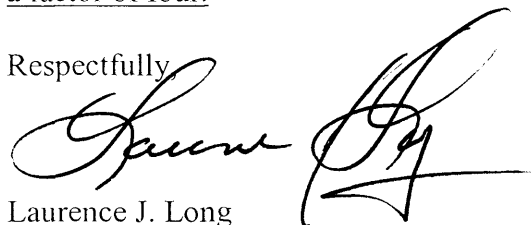
We welcome the opportunity to submit comments on the OMB's and the SEC's estimates of the time necessary to complete the Form 144. Both agencies have estimated that it requires 2.0 hours to complete this form. Based on our extensive experience with the forms, we believe that this figure is overstated by at least a factor of four.

Our conclusion is based on two points. First, while the OMB has assigned a completion time of 0.5 hours for the Form 4 compared to 2.0 hours for the Form 144, both forms require a comparable number of data items. Consequently, the completion times for the forms should also be comparable.

Secondly, it takes us only 3 minutes on average to key and proof the Form 144 data items. Based on this pattern, the OMB's estimated completion time of 2.0 hours is significantly overstated. Using the Form 4 completion time of 0.5 hours for the Form 144 represents a more accurate estimate.

Therefore, the SEC's estimated burden reduction of 60,300 hours is overstated by at least a factor of four.

Respectfully

A handwritten signature in black ink, appearing to read "Laurence J. Long". The signature is written in a cursive style with a large, sweeping initial "L" and a long horizontal stroke at the end.

Laurence J. Long
President