



August 31, 2007

Ms. Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549-1090

Re: Comments on Proposed Amendments to Regulation SHO; File No S7-19-07

Dear Secretary Morris:

I appreciate the opportunity to provide comments on the Commission's proposed amendments to Regulation SHO. I am Vice President and General Counsel of USANA Health Sciences, Inc. ("USANA"), a publicly traded (NASDAQ) company located in Salt Lake City, Utah that develops and manufactures high-quality nutritional and personal care products that are distributed by a vast network of independent distributors residing throughout the United States, Canada, Australia, New Zealand, Hong Kong, Japan, Taiwan, South Korea, Singapore, Mexico, Malaysia, the Netherlands, and the United Kingdom. Currently, the company has over 170,000 independent distributors and another 80,000 preferred customers worldwide.

We support the Commission's proposal to amend Regulation SHO by eliminating the options market maker exception and the grandfather provision, and we urge the Commission to complete this amendment by year's end. The options market maker exception must be eliminated promptly. It is a well known tool of manipulators and must be removed to ensure a level playing field for public companies and their shareholders.

While the elimination of the options market maker exception and the grandfather provision will significantly strengthen Regulation SHO, these changes alone will not adequately address the problem that results in continued naked short selling and failures-to-deliver. **We request that the Commission (1) further amend Regulation SHO by requiring a firm location of shares to be borrowed before a short sale can be executed, and (2) foster greater transparency by requiring timely disclosure of the volume of failures-to-deliver shares of companies on the Regulation SHO threshold list.**

We have been encouraged that the SEC has recently taken a renewed and justified interest in this issue as noted by Chairman Cox's recent remarks about the abuses of naked short selling and the need to end these manipulative practices. However, we remain concerned that, despite the Commission's recent efforts and Chairman Cox's public comments, these abuses continue as if nothing were going to impede them. Accordingly, the Commission should issue and complete promptly a notice of proposed rulemaking to implement these two remaining, vital components of effective Regulation SHO reform.

Sincerely,

James H. Bramble
Vice President & General Counsel

- cc: Christopher Cox, Chairman, U.S. Securities and Exchange Commission
- Paul S. Atkins, Commissioner, U.S. Securities and Exchange Commission
- Roel C. Campos, Commissioner, U.S. Securities and Exchange Commission
- Kathleen L. Casey, Commissioner, U.S. Securities and Exchange Commission
- Annette L. Nazareth, Commissioner, U.S. Securities and Exchange Commission