Comment on Notice 2022-07

from Maryann Cantone, Cantone Research, Inc.

at email address MCantone@cantone.com

on Tuesday, August 2, 2022

Comment:

Re: the proposal for 1 min trade reporting

This is impossible to accommodate 100% of the time. A realistic goal is 10 min. We have been doing bond trades for decades.

This idea sounds like it came from a group of people that never had real-world experience inputting bond trades and dealing with the aftermath of it. Call me if you want more details on why. But this would be a nightmare for small firms. Please just dont do it.

Thanks,

Cantone