
From:
Sent: 04, January, 2016 5:34 PM
To: spr-consult
Subject: SFC Consultation Paper - Securities and Futures (Short Position Reporting) Rules - November 2015

Dear Sir or Madam,

We are writing in response to the Commission's consultation to expand the scope of short position reporting and on the corresponding amendments to the Securities and Futures (Short Position Reporting) Rules issued in November 2015.

Please be advised that we have no comments in response to the specific questions asked in the Consultation Paper but we would be grateful if the Commission could please consider our related proposals which are as follows:

1. Securities may be deleted from the list of Designated Securities at a time where a market participant already holds a reported short position. Please confirm that market participants no longer have to report changes to or a closing of such short positions in those "non-Designated" securities as they will no longer fall within the definition of "Specified Shares".
2. The current threshold (the lower of HK\$30 million and 0.02%) is extremely low in comparison to short reporting regimes in other major financial centres. To support inter-jurisdictional consistency and comparability, BlackRock proposes that the reporting threshold trigger be raised to 0.2% or 0.5%.

Best regards,

BlackRock

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