

Clisby & Co.
Investment Securities
Macon, Georgia

February 1, 1968

Securities and Exchange Commission
Office of the Secretary
500 North Capitol Street
Washington, D.C. 20549

Re: Release # 8239, dated 1-26-68
Proposed Rule 10b-10

Gentlemen:

We are a relatively small SEC registered Broker/Dealer, and are quite concerned about your above referenced release.

We recognize the economic and the ethical basis of the SEC; the NASD; the NYSE; the regional exchanges, and the large and small OTC brokers. They make up the brokerage industry and have been the pipe line that has collected and kept liquid the equity capital which has nurtured the economic growth of this country.

Let's not dismember this group -- let's not over-balance one against the other.

A rule such as 10b-10 will increase the rate of attrition of the small OTC firm, and their attrition is already well in evidence today. Obviously, only the largest will have the facilities to do an institutional brokerage business -- you imply this on the bottom of page 2. If give-ups and reciprocals are prohibited, the discrimination will weigh heavily against the non-institutional broker and will harm all but the largest members of the industry regardless of their exchange affiliations

Why should the NYSE, which operates similar to a trust or private club, so strongly influence the rules of the industry? Imagine the brokerage facilities that will be available to our citizens when only the NYSE exists!

Certainly the SEC sees this. We implore you to give more consideration to the plight of the little fellow. We have no one to represent us and we are gradually being choked to death.

We object to the proposed rule 10b-10 and to the unhealthy influence upon the industry by the NYSE.

Sincerely,

Eugene H. Killen
Secretary