

From: Tom Perham
Proposal: 1432 (RIN 7100 AD 82) Reg. V V - Proprietary Trading and Certain Interests In, and Relationships
Subject: Volcker Rule -- Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and R

Comments:

Public Comments on Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and Relationships with, Hedge Funds and Private Equity Funds:

Title: Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and Relationships with, Hedge Funds and Private Equity Funds
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Comment: 1. The proposal does not seem to contain any mechanism to hold the agencies responsible for enforcing this regulation accountable if they fail to aggressively enforce it.

2. There does not seem to be any provision for independent evaluation of the implementation of this regulation by agencies tasked with making it accomplish what it is intended to accomplish. Without outside, independent evaluation, we can never truly know if the agency actions are accomplishing what the drafters intended to accomplish with this legislation.

3. Without accountability and evaluation provisions, this will surely not accomplish much.