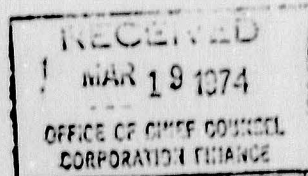


000011

2863 Glenmare St.
Salt Lake City,
Utah, 84106
March 13, 1974

Mr. John Heneghan
Deputy Chief Counsel
Securities and Exchange Commission
Washington D.C. 20549



Dear Mr. Heneghan:

→ AVAILABLE 4-8-74
UNDER 33 ACT - 4(1)

Your March 7, 1974 letter states that your Division is unable to conclude that the 1,250 shares of TeleMation, Inc. stock which I hold may be sold publicly at this time without compliance with the registration requirements of the Act or Regulation A, if available.


Two questions come to mind as a result of your letter:

(1) It has been my understanding that as an alternative to obtaining a No-action letter, the stock could be sold under rule 144. Will you confirm to me whether or not the stock may be sold under rule 144.

(2) Your letter indicates the primary reason for denial of the request for a No-action letter is "the relatively short period of time the securities have been held". I have been led to believe that rule 144 established a two year holding period as being adequate. Inasmuch as the stock has already been held for longer than two years, would you clarify what period of time would be considered by your Division to be sufficiently long to permit a No-action letter to be issued.

It is not clear to me why the representative in your local office suggested that I request a No-action letter rather than selling the stock under rule 144. Would you inform me which of the two courses of action is the proper one to pursue.

Sincerely,


Floyd Moon