

FINRA
c/o Marcia E. Asquith
Office of the Corporate Secretary FINRA
1735 K Street, NW
Washington, DC 20006-1506

Re: Regulatory Notice 15-20

Dear Ms. Asquith,

My firm is a third party marketer and a FINRA member. I am also a member of the Third Party Marketer's Association (3PM). I have had an opportunity to review Lisa Roth's comment regarding Regulatory Notice 15-20 regarding the concept proposal to restructure the Representative-Level Qualification Examination Program. I urge FINRA's Board to carefully consider Ms. Roth's thoughtful and informed commentary in the attached PDF, which has earned my strong support.

Steven Rubenstein
Arrow Investments, Inc.
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