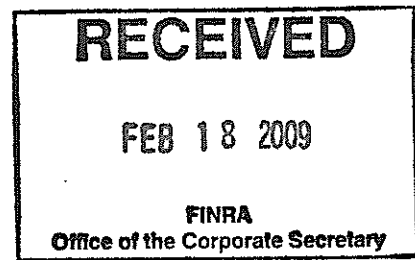


Ms Marcia Asquith
Finra
1735 K Street
Washington, DC 20006



Re: MTN 09-06-retail forex

I send this to you hard copy because our system could not find your reply site:
pubcom@finra.org

This firm carried an NFA licence for some ten years as well as the Finra membership which we continues to hold. Thus we are familiar with commodities, futures as well as securities trading.

In absence of overt actions which force Finra staff to forclose lines of business to this type of firm, Finra should not limit our ability to satisfy bonefide investor demands. Our firm has served the investment needs of institutional and retail clients for some 21 years. We survive in difficult times because we have flexibility to offer a broad range of investment solutions tailored to specific investor needs, included at times forex, commodities and future contracts.

Please be reminded that the performance deposit placed with a futures firm is not a Treasury regulation t margin call. Please do not try to apply security margin requirements (50% or higher) to a futures contract with a performance deposit of some 5-10%. Should you do so, you will shut the door for bd/NFA firms to offer competitive forex terms to its clients.

Because Finra is a membership based organization, Finra should not use its time and treasure to reduce business opportunities available to its member firms, absent compelling cause or causes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Daniel W. Roberts". The signature is written in a cursive, somewhat stylized script.

Daniel W. Roberts
Roberts & Ryan Investments Inc.
President

Rec'd - 2/18/09
~~AKW~~ akw