

Dear FINRA:

With respect to Regulatory Notice 17-38(remote inspections of qualifying branch offices), FINRA still does not seem to understand the issue at hand. These offices do not have anything to inspect. There are no records to review, as the relevant records are maintained at the OSJ/main office. There are no FINRA requirements for these offices. Because these are not locations receiving customers or advertising, there are no physical premises issues that need to be examined. These reviews are nonsense reviews that FINRA created to check a box. They achieve nothing, except wasting more of our time and other resources. Firms should be held responsible for their securities activity, which can be performed completely by review of the underlying documents(account forms, securities applications, etc.) and by regular interactions with the representatives. Inspecting outside representatives' home office telephones and furniture provides us no useful information. If we suspect a problem in one of these non-branch branches, we will make a trip to the office in question. We are business people who are quite aware that we may be one lawsuit away from being out of business. We should be allowed to use our own judgment, which I can assure you from my 30 years of experience is greater than yours.

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