



James Rabenstine
Vice President
NISC and NSLLC Chief Compliance Officer
Office of the Chief Compliance Officer

VIA ELECTRONIC MAIL

Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington, DC 20006-1506

Re: FINRA Regulatory Notice 18-14 / Retrospective Rule Review on the Effectiveness and Efficiency of FINRA Rule 3110(a)(7) on the Annual Compliance Meeting

Dear Mr./Ms. Secretary:

Nationwide Financial Services, Inc. (the "Company")¹ appreciates the opportunity to submit comments regarding FINRA's retrospective review of Rule 3110(a)(7) ("Rule") which requires registered representatives and registered principals ("Reps") to participate in an annual compliance meeting ("ACM").

Comment

Over the past several years, the ACM requirement has been met through a video presentation created by the Compliance Departments for the Companies. Although it takes a great deal of time to write, plan, and execute on the distribution of our presentation, it has been my experience that it is well worth the time and effort. Our Registered Representatives appreciate Compliance's creativity and how ACM information is delivered to them. Our ACMs have executive guest appearances so that our Registered Representatives understand the seriousness of the issues being discussed while delivering the material in an engaging manner.

As Chief Compliance Officer, I am always concerned about how important information is provided to the Companies' Registered Representatives. The ACM is one tool that I find to be very effective way to communicate with our Registered Representatives. Therefore, I have no suggested changes to be made to the Rule.

Thank you for the opportunity to provide comments. If you have any questions, please contact me at (614) 677-1643.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'James Rabenstine', with a large, sweeping flourish extending to the right.

James Rabenstine
Vice President, NISC and NSLLC Chief Compliance Officer
Nationwide Office of the Chief Legal Officer

¹ This comment letter is written on behalf of two of Nationwide Insurance affiliated broker/dealers that are FINRA member firms - Nationwide Securities LLC, ("NSLLC") and Nationwide Investment Services Corporation ("NISC"), respectively.