



M Holdings Securities, Inc.

Member NASD/SIPC

June 13, 2008

VIA ELECTRONIC MAIL

Ms. Marcia E. Asquith
Senior Vice President & Corporate Secretary
1735 K Street, NW
Washington, DC 20006-1500

Re: FINRA Rulebook Consolidation

Dear Ms. Asquith:

Please consider our letter as additional support of the Financial Services Institute (FSI's) comments submitted to you regarding FINRA's Rulebook Consolidation Proposals (Proposed Rules).

We support FINRA's overarching goals in this process to delete obsolete rules, harmonize rules and consider new approaches to the implementation of rules, which may include a tiered approach based on business models.

One significant comment made by FSI that we would like to highlight in our submission as well is the clarification by FINRA of the application of prior interpretive guidance related to the former NASD Rules and their application to the Proposed Rules. FINRA should clarify the application of NASD Notices to Members and other guidance to the Proposed Rules so the firms can continue to rely on this guidance to the extent applicable.

We would like to further highlight comments made by FSI with regard to Proposed Rules applicable to financial responsibility, supervision and supervisory controls and books and records.

Financial Responsibility: With regard Rule Proposal 4110 – We recommend that the provision requiring greater net capital or net worth requirements be struck from this Proposed Rule, as this may greatly impact the operating ability of smaller firms.

With regard to Proposed Rule 9557 we recommend that the two days be extended to five days to allow a firm evaluating financial difficulties additional time to pursue an expedited appeal.

Supervision and Supervisory Controls: Proposed Rule 3110(a) requires firms to “establish and maintain a system to supervise the activities of each associated person.” We recommend that FINRA narrow this language to require firms to “establish and maintain a system to supervise the activities of each registered representative or registered principal actively engaged in the securities business of the firm.”

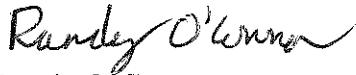
Additionally, we feel that the language in 3110(a) (2) AND 3110(b)(1) is ambiguous. Perhaps the Proposed Rules would be more easily understood if supervision is extended to business the Member Firm is required to supervise under FINRA Rules and written supervisory procedures are established for business the Member Firm is required to supervise pursuant to FINRA Rules.

Books and Records: With regard to Proposed Rule 4512, we recommend FINRA state that firms must maintain “evidence of approval” rather than a “signature” for each account to reflect the use of initials and/or electronic approvals.

With regard to Rule 4513, the Proposed Rule should be narrowed to apply to “written customer complaints that relate to activities subject to regulation by FINRA” to exclude complaints related to activities not within FINRA’s jurisdiction.

Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "Randy O'Connor".

Randy O'Connor
President