



**FIRST ASSET
FINANCIAL** INC
Member SIPC

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April 27, 2018

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

Dear Ms. Mitchell:

We appreciate the initiative of FINRA for a retrospective rule review and the opportunity to comment on current Rules 3270 and 3280. These rules were initiated in a much different time and circumstances and appear to be truly outdated and were direly in need of review. Our firm, a small firm, supports adoption of Regulatory Notice 18-08.

FINRA's proposal for a risk-based approach with respect to assessing OBAs and PSTs will dramatically save costs of a small firm broker dealer (BD) and reduce a firm's administrative and regulatory burden.

We found it impractical to hire Registered Representative to perform commission business with our BD as (1) our firm could not conduct thorough supervision due to the amount of information required by NTM 94-44 & 96-33 (2) we had concerns about the legality of violating privacy laws of a 3rd party Registered Investment Adviser (RIA) and (3) there was a varying amount of animosity created between the RIA/IAR and the BD as he/she saw supervision being redundant and did not wish to compensate the BD for supervision performed by the BD when it was also being performed by their own RIA regulator.

We believe that Notice 18-08 will result in BD's focusing resources in areas within the scope of their business and leave the RIA regulators in direct control of their constituents. Requirements to supervise and ultimately be responsible for activities beyond the scope of a BDs operations and for which we are uncompensated is unjust and beyond FINRA's mandate to require.

The "risk based" approach of Notice 18-08 allows a member firm the ability to determine (1) whether it is in the best interest of the investing public that the OBA be supervised and (2) found that it should be supervised, the nature and extent of supervision to be applied.

Again, the opportunity to comment on this Regulatory Notice 18-08, a wonderful initiative by FINRA, and we strongly support it.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Bob Hamman". The signature is written in a cursive, flowing style.

Robert L. (Bob) Hamman, President & CCO