

As an independent financial advisor, I greatly support FINRA's goal of investor protection and appreciate that FINRA's Comprehensive Automated Risk Data System (CARDS) could further that goal. I also appreciate the opportunity to submit these comments regarding the rule proposal, and FINRA's responsiveness to previous industry suggestions. While I understand the desired benefits of CARDS, I am concerned about additional risks to my clients' data privacy and security and the increasing regulatory costs that may ultimately be passed down to them.

In particular, I have concerns regarding the following issues:

- Data Privacy: I appreciate FINRA's decision to not collect personally identifiable information in CARDS. That said, the data will still contain information that can potentially be linked back to clients. CARDS data will likely be an extremely attractive target for hackers. It would be helpful if the proposal included more specific information on how FINRA will ensure this data is kept safe. I am also concerned that in the event that CARDS is breached, clients will blame their advisors for not keeping this data secure, and the responsibility will fall to us to inform clients of this breach. I encourage FINRA to consider the reputational risk that we face to provide them with this data.

- Data Quality: Because FINRA has decided to not collect direct business data in this phase of CARDS, I am concerned that FINRA will lack a complete picture of client holdings and activity. This is likely to introduce significant short-comings in CARDS' ability to be an effective tool for investor protection. It may produce false-positives that will need to be rectified by advisors like myself and broker-dealer staff responding to inquiries from FINRA. My broker-dealer's home office staff robustly supervises my activity and reviews the suitability of recommendations I make to clients. They possess a complete picture of my clients that CARDS will not have. I am concerned that CARDS will create inefficient work for my broker-dealer and me in responding to inquiries that stem from CARDS' lack of direct business data. Additional inquiries could also result from the CARDS' data lacking a full picture of the client's entire investment portfolio or the lack of information surrounding the client's life circumstances, which are not captured in suitability paperwork and data.

- Additional Transparency: I am concerned that the proposal does not provide sufficient information for the public to weigh the costs and benefits of CARDS. I request that FINRA provide reliable estimates regarding how much money CARDS will save investors, and provide details regarding how it reached these estimates. These estimates will allow the public to weigh the likely costs with the expected benefits. In addition, I encourage FINRA to make a commitment to publish data on an on-going basis for the public to assess whether CARDS is, in fact, achieving its goals.

I urge FINRA to consider and respond to these concerns as it continues to develop the CARDS proposal and thank you for taking my comments into account.

Sincerely,

1. 10/30/2014 David Decker
2. 10/30/2014 Judd Carlton
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572. 11/12/2014 Richard Clary  
573. 11/12/2014 C. Raymond Weldon  
574. 11/12/2014 Tom Castillo  
575. 11/12/2014 Nicholas Smith  
576. 11/12/2014 Robert Alft  
577. 11/12/2014 Daniel Schuette  
578. 11/12/2014 Rocco Capobianco  
579. 11/12/2014 Michael Bora  
580. 11/12/2014 Megan Koopman  
581. 11/12/2014 Robert McGaha  
582. 11/12/2014 Roger Simmons  
583. 11/12/2014 Joe Smalley  
584. 11/12/2014 Anthony Bauer  
585. 11/12/2014 Romil Bhagat  
586. 11/12/2014 Timothy Makovkin  
587. 11/13/2014 Ben Treadaway  
588. 11/13/2014 Gary Frey

589. 11/13/2014 James Lowe  
590. 11/13/2014 Guy Paredes  
591. 11/13/2014 Alan Kranitz  
592. 11/13/2014 Karl Knade  
593. 11/13/2014 Michael Klimis  
594. 11/13/2014 Thierry Sommer  
595. 11/13/2014 Lisa Lopacinski  
596. 11/14/2014 Daniel Centar  
597. 11/14/2014 Travis Morrow  
598. 11/15/2014 Rodney Derbigny  
599. 11/17/2014 Thomas Vickers III  
600. 11/17/2014 Shane McCormick  
601. 11/17/2014 Christine Trapp  
602. 11/17/2014 Robert Beatty  
603. 11/17/2014 Alex Hudak  
604. 11/17/2014 William N. Keen  
605. 11/17/2014 David Cutshall  
606. 11/17/2014 Kristine Lausin  
607. 11/17/2014 Stephen Strickland  
608. 11/18/2014 Gary Deese  
609. 11/18/2014 Mark Reinert  
610. 11/18/2014 Jonathan Visscher  
611. 11/18/2014 Larry Olson  
612. 11/18/2014 Andrea Monaghan  
613. 11/18/2014 Mary LaMoreaux  
614. 11/18/2014 Dale Wright  
615. 11/18/2014 Christopher Patterson  
616. 11/18/2014 Christine Hagen  
617. 11/18/2014 Richard Soohey  
618. 11/18/2014 Nicholas Taverna  
619. 11/18/2014 Valentine Lynch  
620. 11/18/2014 Van Robin Jonker  
621. 11/18/2014 Lisa Gerardi  
622. 11/18/2014 Rick Stevens  
623. 11/18/2014 Kimberly Hankins  
624. 11/18/2014 Richard Schaefer  
625. 11/18/2014 Kevin McGrath  
626. 11/18/2014 Tony Pulley  
627. 11/18/2014 Jerry Carden  
628. 11/18/2014 Robert Li  
629. 11/18/2014 Chris H. Naum  
630. 11/18/2014 Kurt Zoeller



631. 11/19/2014 Brian Ginty  
632. 11/19/2014 Robert Franer  
633. 11/19/2014 Gregory Tarr  
634. 11/19/2014 Steven Houser  
635. 11/19/2014 William Lohrenz  
636. 11/20/2014 Richard Pinion  
637. 11/20/2014 Jeremy Ayers  
638. 11/20/2014 Bob Palmer  
639. 11/22/2014 Bob Gerber  
640. 12/1/2014 William Ward  
641. 12/1/2014 Brad Blackburn  
642. 12/1/2014 Richard Allison  
643. 12/1/2014 James Bishopp  
644. 12/1/2014 Michael Molitoris  
645. 12/1/2014 Michael Curtis  
646. 12/1/2014 Ed Bosch  
647. 12/1/2014 Eric Wishan  
648. 12/1/2014 Anthony Hill  
649. 12/1/2014 Daniel Gilbertson  
650. 12/1/2014 Michael McLaughlin  
651. 12/1/2014 William Gettings  
652. 12/1/2014 Neal Doty  
653. 12/1/2014 Peter Gutekunst  
654. 12/1/2014 Greg Nardolillo  
655. 12/1/2014 Richard Pittman  
656. 12/1/2014 Robert Smith  
657. 12/1/2014 Daniel Steward  
658. 12/1/2014 Janet Fox  
659. 12/1/2014 \*Charles Ballou  
660. 12/1/2014 Stephen Hutton  
661. 12/1/2014 Ricardo Latta  
662. 12/1/2014 Gayle Norris  
663. 12/1/2014 Richard Reiser  
664. 12/1/2014 Linda Read  
665. 12/1/2014 HB Smart  
666. 12/1/2014 Michael Budas  
667. 12/1/2014 Ryan Shaw  
668. 12/1/2014 Brian Conway  
669. 12/1/2014 Jason Bednarz  
670. 12/1/2014 Kevin Engbers  
671. 12/1/2014 John Arnot  
672. 12/1/2014 Erick Olson

673.	12/1/2014	Bryan Stanfill
674.	12/1/2014	Diane Neighoff
675.	12/1/2014	David Gallant
676.	12/1/2014	George Webb
677.	12/1/2014	Christina Perna
678.	12/1/2014	Wayne Jacobson
679.	12/1/2014	Will Van Skiver
680.	12/1/2014	William Guise
681.	12/1/2014	Debra Chandler
682.	12/1/2014	John Shrewsbury
683.	12/1/2014	Michael Marino
684.	12/1/2014	Michael Chiodo
685.	12/1/2014	Scott Cody
686.	12/1/2014	Michael Ecker
687.	12/1/2014	Larry J. Tolbert
688.	12/1/2014	Mark Reinert
689.	12/1/2014	Kim Hellerman-Hersman
690.	12/1/2014	A Geoffrey Wade
691.	12/1/2014	John Swaim
692.	12/1/2014	Mary Zamboni
693.	12/1/2014	William Trembler
694.	12/1/2014	Kevin Carbin, Jr.
695.	12/1/2014	Phi Krznarich
696.	12/1/2014	Joseph Comerford
697.	12/1/2014	Michael Destro
698.	12/1/2014	Scott Thaxton
699.	12/1/2014	Trevor Johnson
700.	12/1/2014	Ronald Boyce
701.	12/1/2014	David Johnson
702.	12/1/2014	Christopher Kelly
703.	12/1/2014	Sally Wolfe
704.	12/1/2014	Michael LoNano
705.	12/1/2014	Susan McClelland
706.	12/1/2014	Jose Martin
707.	12/1/2014	Debra Brennan Tagg
708.	12/1/2014	Jason Baker
709.	12/1/2014	Darrick Munsch
710.	12/1/2014	Joseph Storthz
711.	12/1/2014	Kevin Chiu
712.	12/1/2014	Barry Clapper
713.	12/1/2014	Warren Ludford
714.	12/1/2014	Mark Wingerd

715.	12/1/2014	Gabe Martinez
716.	12/1/2014	Michael Mercurio
717.	12/1/2014	William Zaika
718.	12/1/2014	Ramu Ramiah
719.	12/1/2014	Benjaman Glidden
720.	12/1/2014	Bill Casagrande
721.	12/1/2014	Jared Flanagan
722.	12/1/2014	Gerald Chambers
723.	12/1/2014	Larry Fisher
724.	12/1/2014	Kevin McGrath
725.	12/1/2014	David Leist
726.	12/1/2014	Arnold Magid
727.	12/1/2014	Fred Miller
728.	12/1/2014	David Lutz
729.	12/1/2014	David Batman
730.	12/1/2014	Don Jacobson
731.	12/1/2014	R Gregory Smith
732.	12/1/2014	Dan Feltz
733.	12/1/2014	Scott Thomas
734.	12/1/2014	Omar Cujar
735.	12/1/2014	Richard Carlson
736.	12/1/2014	Tom Fulton
737.	12/1/2014	Scott Feher
738.	12/1/2014	David Lee
739.	12/1/2014	Andrew Lippman
740.	12/1/2014	Paul Long
741.	12/1/2014	John Barbour
742.	12/1/2014	James Stefanski
743.	12/1/2014	Jim Guyot
744.	12/1/2014	Michael Doumani
745.	12/1/2014	Donaldd Rook
746.	12/1/2014	John Matheis
747.	12/1/2014	Eugene Jordan
748.	12/1/2014	James Hobson
749.	12/1/2014	Julienne Buxton
750.	12/1/2014	David Kees, Sr.
751.	12/1/2014	Richard Pascoe
752.	12/1/2014	Jervis DiCicco
753.	12/1/2014	Sean Cavanaugh
754.	12/1/2014	Karen Busanovich
755.	12/1/2014	James Broaddus
756.	12/1/2014	Ted Chibnall

757. 12/1/2014 Donald Barrett  
758. 12/1/2014 John Hance  
759. 12/1/2014 Denise Ford  
760. 12/1/2014 T. Christian Drumm  
761. 12/1/2014 Andrew Dodds  
762. 12/1/2014 Staci Templeton  
763. 12/1/2014 Edward Dempsey  
764. 12/1/2014 Gregory Smith  
765. 12/1/2014 Norma Greenly  
766. 12/1/2014 Francis Fennie  
767. 12/1/2014 MacAuley Beloney  
768. 12/1/2014 William Anderson  
769. 12/1/2014 Katherine Praydick-Meo  
770. 12/1/2014 Scott Walton  
771. 12/1/2014 Joseph O'Donnell  
772. 12/1/2014 Jeff St. Clair  
773. 12/1/2014 Michael Van Hoof  
774. 12/1/2014 Thomas Clinton  
775. 12/1/2014 Paul Allard  
776. 12/1/2014 Scott Bass  
777. 12/1/2014 Scott McCord  
778. 12/1/2014 Kevin Brown  
779. 12/1/2014 Frederick Hubler Jr.  
780. 12/1/2014 Chad Norling  
781. 12/1/2014 Kevin Price  
782. 12/1/2014 Michael Klein  
783. 12/1/2014 Michael S. Cullen  
784. 12/1/2014 Craig Jensen  
785. 12/1/2014 Gerald Money Penny  
786. 12/1/2014 David Bahnick  
787. 12/1/2014 Christopher Jacob  
788. 12/1/2014 Edward Fredericks  
789. 12/1/2014 Donald Freeman  
790. 12/1/2014 Virginia Ballard  
791. 12/1/2014 Lawrence Purcell  
792. 12/1/2014 James Lane  
793. 12/1/2014 Steve Bonner  
794. 12/1/2014 Ross Collingwood  
795. 12/1/2014 Jeff Todd  
796. 12/1/2014 Michael Raspallo  
797. 12/1/2014 Domna Del Rio  
798. 12/1/2014 Al Ellison

799.	12/1/2014	Rick Meiss
800.	12/1/2014	Glenn Wake
801.	12/1/2014	William Morrison
802.	12/1/2014	Jeff Huff
803.	12/1/2014	Richard Maxwell
804.	12/1/2014	Alfred Marciano
805.	12/1/2014	Szablis Klee
806.	12/1/2014	David Couse
807.	12/1/2014	Darren Royal
808.	12/1/2014	Mary Dail
809.	12/1/2014	Carter Honeycutt
810.	12/1/2014	Jeannie Luckey
811.	12/1/2014	Robert Cannella
812.	12/1/2014	Thomas Beasley
813.	12/1/2014	Brian Torgerson
814.	12/1/2014	Bradford Creger
815.	12/1/2014	Paul DeLisio
816.	12/1/2014	Bryan Mills
817.	12/1/2014	Dan Warnke
818.	12/1/2014	Joseph E. Lethbridge
819.	12/1/2014	Michael Allen
820.	12/1/2014	David Mulhall
821.	12/1/2014	Patricia Proud
822.	12/1/2014	Donald Kennedy
823.	12/1/2014	Jeffrey Smith
824.	12/1/2014	Steven Blouse
825.	12/1/2014	Merritt Hunt
826.	12/1/2014	George Jones
827.	12/1/2014	*Charles Ballou
828.	12/1/2014	Robert O'Neill
829.	12/1/2014	Caroline Boggs
830.	12/1/2014	Tom Burbank
831.	12/1/2014	Andrew Couch
832.	12/1/2014	David Weilleumier
833.	12/1/2014	J. Thomas Parker
834.	12/1/2014	Timothy Hamano
835.	12/1/2014	Mel Hertz
836.	12/1/2014	Grant Hartwell
837.	12/1/2014	Peter Han
838.	12/1/2014	J. A. Tyler Browning II
839.	12/1/2014	Theodore Athans
840.	12/1/2014	Timothy Weimer

841.	12/1/2014	Jeremy Lipinski
842.	12/1/2014	David Hubbard
843.	12/1/2014	Janet Greiner
844.	12/1/2014	Rodney Greiner
845.	12/2/2014	Julie Casserly
846.	12/2/2014	Gary Collins
847.	12/2/2014	Mitchel Shapiro
848.	12/2/2014	Rebecca Hannan
849.	12/2/2014	Marvin Grey
850.	12/2/2014	Kenneth Kramer
851.	12/2/2014	Tom Prybylo
852.	12/2/2014	Bobby Merchant
853.	12/2/2014	Christine Burrhus
854.	12/2/2014	Joseph Towson
855.	12/2/2014	Michael Raeber
856.	12/3/2014	Gary Donovan
857.	12/3/2014	Nancy Chao
858.	12/4/2014	David Jenkins
859.	12/4/2014	Steve Hayden
860.	12/5/2014	Patricia Beine
861.	12/5/2014	Amanda Strembicke
862.	12/5/2014	Ronald Jaeger
863.	12/5/2014	Eric Meushaw
864.	12/8/2014	Pamela Cunningham
865.	12/8/2014	Susan Dick
866.	12/8/2014	David Smith
867.	12/8/2014	Ronald Kresel