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

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RE: Comment on CARDS

Automated analytics cannot and should not replace human oversight of risk. Your proposal to mine and collect copious amounts of client data is a monstrous invasion of privacy. Having the technology to analyze the data does not automatically give you the right to collect the personal information on private citizens. FINRA suggests that it would collect basically all of the details on a client account, including investment objectives and date of birth. This is absolutely a case of regulatory overreach and I find it difficult to understand how any thinking person would come to the conclusion that this is a good idea.

Sincerely,

Ann Doty-Mitchell

Disclaimer: this represents my personal view and not necessarily those of my firm.