Marcia E. Asquith Senior Vice President and Corporate Secretary FINRA 1735 K Street Washington, DC 20006

**RE: FINRA** Communications with the Public Rule Proposals

Dear Ms. Asquith:

The Leaders Group, Inc. appreciates the opportunity to comment on the rules proposed to govern communications with the public. On the whole, we feel these rules are designed to enhance members' communication with the public. However, we find a few areas where we feel these rules will diminish members' abilities to communicate with customers.

In particular, the definition of correspondence, 2210 (a)(2), as proposed, is too limited. We would like to see communications to existing customers added to this definition. We feel communication with customers is very important, and we feel that narrowing correspondence to this definition will hinder registered representatives from communicating with their existing customers.

Also of concern are sections (c) (3) (A) through (D). The statements broadly generalize any communication concerning different investment types. This will subject almost all communications to review.

FINRA Chairman and CEO Richard Ketchum was recently quoted in relation to the formation of the Social Networking Task Force to look at "how regulation can embrace technological advancements in ways that improve the flow of information between firms and their customers—without compromising investor protection." We feel that many of the aspects of these proposals will not improve the flow of communication, which in turn will compromise investor protection.

We hope the rulemaking committee will look at this proposal again before sending it on to the SEC.

Thank you for the opportunity to comment.

Sincerely,

## Z. Jane Riley

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