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

November 28, 2014

RE: Comment on CARDS Regulatory Notice 14-37.

Thank you for the opportunity to comment. This letter represents my personal views as a consumer, and not those of any member firm with which I may be associated.

There is already far too much personal digital information out there. Clients have no desire for all their personal financial information (except name) to be relayed needlessly to a third party, even if that third party is FINRA. I've yet to read how FINRA proposes to protect consumers against an attack by hackers, foreign or domestic. It seems the primary focus of CARDS is to make FINRA risk management task easier.

One huge concern is that if CARDs is enacted, in its current form, a customer would have to agree with feeding all their financial data (except name) to FINRA, as a condition of having a brokerage account. This smacks of overreach in regard to personal privacy.

Regulation SP has been the guiding light in this regard for many years, allowing a customer to opt out of information sharing with third parties. CARDS may be acceptable if an investor could opt-out of sharing their financial data with FINRA. I realize that this would likely result in FINRA not having complete data on all investments, but since FINRA proposes CARDS as consumer protection, it seems that the customer should be able to choose to be protected or not. If a consumer doesn't want FINRA's oversight on their transactions, there must be a mechanism that protects the public's privacy.

Sincerely,

Ann Doty-Mitchell