

Advertising Regulation Electronic Filing

Member firms can now send PDF files of advertisements and sales literature directly to the Advertising Regulation Department for review via the Web. This reflects a major enhancement to the Advertising Regulation Electronic Files (AREF) system, which was introduced in mid-2002. Previously, AREF provided members with electronic access to NASD comment letters on their filings. The system was upgraded in late 2002 to permit registered users at members firms to upload new communications for review by NASD staff.

The enhanced system enables firms to track filings as they move through the review process. In response to requests for Expedited review, the system sends Review Status Confirmation letters confirming whether the review has been accepted on an Expedited basis.

Accessing AREF

AREF is one of several Web-based applications provided to NASD member firms as part of the Regulation Form Filings System. Other applications include FOCUS, Blue Sheets, and Customer Complaints. To use AREF an individual must have a user name and password as well as appropriate entitlements from his or her member firm. Individuals should contact the Regulation Form Filing Account Administrator at their firms to obtain these permissions. If an individual does not know who the Regulation Form Filing Account Administrator is at a given firm, he or she should call Gateway Business Applications Support at (800) 321-NASD to request this information and details about account administration and entitlements.

Detailed instructions on how to submit material via AREF appear in the [Navigation Guide](#) for the system.

AREF System Highlights

The enhanced AREF system permits users to:

- Submit PDF files of communications with the public for review by the Department.
- Track pending filings awaiting review by the Department.
- Receive and view Review Status Confirmation letters in response to requests for Expedited review.

- Search for, view, print, and save Department letters, including archived letters dating from the previous three years.
- Receive e-mail notification when a new NASD letter is available
- Set two distinct permission levels:
 - Read Own Comments: allows the user to see only those comment letters addressed to that individual.
 - Read All Firm Comments: allows the user to see all comment letters sent to the member firm.

Use of AREF is voluntary. The Department will continue to accept hard copy and facsimile filings. The Department will also send hard copy letters to members via first class mail, unless the individual to whom NASD's letter is addressed has registered on AREF and elected on the system **not** to receive hard copy letters.

To view AREF, visit the [AREF Web Site](#). If you have questions about the enhanced system, call the Advertising Regulation Department staff at (240) 386-4500.

Regulatory Short Takes

NASD Disciplinary Action Emphasizes Requirement to Disclose Special Cash Compensation Arrangements in the Sale and Distribution of Mutual Funds

In a recently settled disciplinary action, NASD fined and censured IF Distributor, Inc. ("IFD"), a distributor of mutual fund shares, \$125,000; and fined and censured VESTAX Securities Corporation ("VESTAX"), a broker/dealer affiliated with IFD, \$25,000, for failing to ensure the disclosure of special cash compensation paid in the sale of mutual fund shares.

NASD Rules require special cash compensation arrangements in the sale and distribution of investment company securities to be disclosed to the public. Specifically, NASD Rule 2830(l)(4) states, in part:

"No member shall accept any cash compensation from an offeror unless such compensation is described in a current prospectus of the investment company. When special cash compensation arrangements are made available by an offeror to a member, which arrangements are not made available on the same terms to all members who distribute the investment company securities of the offeror, a member shall not enter into such arrangements unless the name of the member and the details of the arrangements are disclosed in the prospectus."¹

The NASD disciplinary action, in which the Respondents did not admit or deny the allegations but consented to the entry of findings, involved special cash compensation arrangements paid by IFD to VESTAX in the distribution and sale of a new family of mutual funds. In January 1998, approximately 100 registered representatives ("RR

Group") left another brokerage firm and registered with VESTAX. When the RR Group joined VESTAX, many of their customers followed and transferred their accounts and assets to the new firm. In December 1998, to encourage sales of the new IFD funds, IFD paid affiliated dealers a bonus of 1% to be passed on to the brokers who sold shares of the new funds. In addition to the 1% bonus, IFD entered into two special cash compensation arrangements with the RR Group, paying the group an additional 1% on sales of Class A shares. In each instance, the arrangement provided different and special cash compensation to a limited group of representatives, and to one brokerage firm, providing for greater compensation on sales of certain funds to this select group.

While the payments were made to the RR Group from December 1998 through June 1999, this special compensation arrangement was not disclosed until May 14, 1999. Prior to this disclosure, the RR Group sold over \$20 million in Class A shares to over 200 customers, resulting in IFD paying, and these brokers receiving, approximately \$220,000 in special cash compensation.

¹ To the extent that various cash compensation arrangements would qualify as the types of arrangements required to be disclosed in the Statement of Additional Information (SAI) by the SEC's amended Form N-1A, such as Rule 12b-1 fees, sales charges, sales charge waivers, broker reallowances, multi-class plans, and master-feeder arrangements, disclosure of these arrangements in the SAI satisfies NASD disclosure requirements. Please see [Notice to Members 99-55](#).

Reminder to Members That Their Supervisory Systems and Written Supervisory Procedures Must Be Periodically Amended

NASD is issuing this Regulatory Alert as part of its continuing effort to remind members that their supervisory systems and written supervisory procedures must be periodically amended so that sales of new and complex products comply with all relevant NASD and SEC Rules. Failure to update supervisory systems and procedures and failure to supervise registered persons may place at risk the protection of investors and integrity of the public markets and can result in serious sanctions for the member and the supervisor, including fines, requalification requirements, and suspensions, bars, or expulsions.

Compliance guidelines generally set forth the applicable rules and policies that must be adhered to and describe specific practices that are prohibited. Supervisory procedures document the supervisory system that has been established to ensure that compliance guidelines are being followed and to prevent and detect prohibited practices. There is no "one-size-fits-all" supervisory system. Each member's supervisory system must be tailored to its particular needs and circumstances and reasonably designed to achieve compliance with applicable securities laws, rules, regulations, and NASD rules. Once a member has designed its supervisory system, it is required to memorialize this system in writing and implement and enforce those written procedures.

NASD has issued a series of *Notices to Members (NtMs)* that provide guidance on establishing appropriate supervisory systems and procedures. [NtM 98-38](#) reminds members of their obligation to supervise associated persons located in Offices of Supervisory Jurisdiction (OSJs), branch offices, and all other offices, and to inspect these offices. [NtM 99-45](#) provides guidance on establishing supervisory systems and written

supervisory procedures. [NtM 99-45](#) also explains the differences between compliance procedures and supervisory procedures. [NtM 98-96](#) elaborates on member firms' responsibilities for supervision for trade reporting and market making activities.

Under Rule 3010(a)(8), at least one principal must be designated to review the firm's supervisory system to determine the effects of changes, such as hiring additional representatives (who may be inexperienced in selling the firm's products) and adding new business lines or new financial products, such as transactions in hedge funds and funds of hedge funds, security futures, and brokered certificates of deposit, so that a firm can adjust its supervisory procedures to ensure compliance with all relevant NASD and SEC rules.¹ In addition to reviewing their supervisory systems and procedures to ensure that they are current and adequate, it is also important that members conduct inspections to determine whether the systems and procedures are being followed. Paragraph (c) of Rule 3010, therefore, requires members to annually review the businesses they conduct, and sets forth the standard for this review.

Further, the quality of a firm's internal investigations is a crucial element of an effective supervisory program. [NtM 97-19](#) lays out the elements of a comprehensive supervisory program with special emphasis on the supervisory issues related to registered representatives requiring heightened supervision. Nevertheless, many of the precepts discussed in [NtM 97-19](#) represent best supervisory practices for all member firms.

In particular, member firms should conduct a meaningful internal investigation of irregularities discovered through the supervisory process. If a member receives repeated sales practice complaints against a registered representative, those complaints may indicate a compliance problem. Whenever a member firm determines that a customer complaint is well founded, the firm should conduct a thorough review of selected customer accounts of the registered representative for conduct similar to the conduct described in the complaint. In addition, members should regularly adapt and amend their supervisory procedures in light of customer complaints, arbitrations, lawsuits, and regulatory inquiries and actions.

Member firms should apply those same principles when investigating other irregularities and potential compliance issues within the firm. It is prudent for firms to broaden their review of specific matters to determine whether the irregularities are isolated incidents or part of a pattern of noncompliance.

Following best supervisory practice provides essential safeguards for NASD members and their customers. NASD reminds members to take the time needed to review, update, and strengthen their current supervisory procedures.

Firms should direct their questions regarding the compliance with NASD supervisory requirements to the NASD Department of Member Regulation at (202) 728-8221.

¹ The following recent *NtMs* discuss sales practices relating to particular financial products and remind members of their obligation to have appropriate supervisory procedures and systems in place to monitor the sales of these products: [NtM 03-07](#) reminds members of their obligations when selling hedge funds and [NtM 02-69](#) clarifies members' obligations regarding brokered certificates of deposit. In [NtM 02-85](#), NASD directs members that sell mutual fund shares to immediately review the adequacy of its policies and procedures to ensure that they are designed and implemented so that investors are charged the correct sales loads on mutual fund transactions.

Two recent NASD Investor Alerts ([Should You Exchange Your Life Insurance Policy](#) - September 23, 2002, and [Should You Exchange Your Variable Annuity](#) - February 15, 2001) and [NtM 00-44](#) give members information regarding their responsibilities regarding the sale of variable life insurance. [NtM 00-44](#) expressly reminds members that supervisory systems must be tailored specifically to a member's business and must address the activities of all of the member's registered representatives and associated persons.

TRACE

SEC Approves Expanding TRACE Corporate Bond Price Reporting

The Securities and Exchange Commission has approved NASD's request to increase the number of corporate bonds for which prices are disseminated over the TRACE (Trade Reporting and Compliance Engine) system. Beginning March 3, the number of corporate bonds subject to reporting increased from 540 to over 4,000, representing approximately 75 percent of average daily trading volume.

NASD sought the change, approved by the SEC January 31, to provide additional transparency in the corporate bond market. TRACE now disseminates reports on all A-rated or better bonds whose original issuance was \$100 million or greater. NASD launched the system last July.

In addition, NASD won SEC approval to disseminate transaction reports on 90 of the lowest-rated investment grade corporate bonds. NASD plans to review the empirical data gathered from this test group of "triple-B" bonds to determine the impact that dissemination may have on the liquidity of a market or a market sector. TRACE will begin dissemination of "triple-B" corporate bonds reports in the near future, once NASD identifies the 90 specific securities that will be subject to reporting.

With three-quarters of daily corporate bond trades now covered by TRACE dissemination, NASD substantially exceeds the 50 percent goal established for Phase II by the SEC. (See [NASD Notice to Members 03-12](#))

Background

NASD began requiring members to report transaction information on all TRACE-eligible corporate bonds on July 1, 2002. At that time, NASD also began disseminating TRACE transaction information on 540 corporate bonds. Specifically, under Rule 6250, transactions in two types of securities were subject to the TRACE dissemination requirements:

1. those transactions in investment-grade corporate bonds having an initial issuance size of \$1 billion or greater, and
2. those transactions in 50 representative, non-investment grade corporate bonds that also met other criteria set forth in Rule 6250(a)(2). At the time that TRACE began, NASD also was obligated and intended to require the dissemination of additional securities in the future.

Amendments to Increase Dissemination

NASD formed an advisory committee, the Bond Transaction Reporting Committee (BTRC), composed of 10 representatives, to study issues relating to transparency and increased dissemination of corporate bond transaction reports. With the concurrence of the BTRC, in early December 2002, NASD proposed adding two groups of securities to those already subject to dissemination under Rule 6250. These are the changes approved January 31 by the SEC.

- First, in Rule 6250(a)(3), NASD will disseminate transaction information on any TRACE-eligible security that is investment grade; is rated by Moody's Investors Service, Inc. as "A3" or higher, and by Standard & Poor's as "A-" or higher; and has an original issue size of \$100 million or greater. In addition, a security that is required to be disseminated under the criteria above, on or after March 3, continues to be subject to dissemination unless the security is downgraded below "Baa3/BBB-."
- Second, in Rule 6250(a)(4), NASD is required to disseminate transaction information on 90 "Baa/BBB" securities designated by the organization. Upon completing the selection process, NASD will announce the effective date of this provision in a *Notice to Members*.

Under paragraph (a)(4) of Rule 6250, NASD is required to identify three groups of 30 "triple-B" securities. At the time of designation, each TRACE-eligible security in Group 1 must be rated "Baa1/BBB+" and each TRACE-eligible security in Groups 2 and 3 must be rated, respectively, "Baa2/BBB" and "Baa3/BBB-." In addition, if a TRACE-eligible security has a rating from only one rating agency, it may not be designated.

Other Changes

The SEC also approved two additional minor TRACE rule changes. First, in Rule 6210(e), NASD clarified the term "party to the transaction" to mean a customer, in addition to an introducing broker/dealer, if any, and an executing broker/dealer. Also, for the purposes of Rule 6210(e), "customer" includes a broker/dealer that is not an NASD member.

Rule 6260 permits NASD, at its discretion, to accept from the managing underwriter of a new issue a CUSIP number and other information sufficient to identify the unique characteristics of the bond eligible for TRACE reporting. The rule still calls for the managing underwriter to submit the following six types of information with respect to the new security: (1) a CUSIP number identifying the security; (2) the issuer name; (3) the coupon rate; (4) the maturity; (5) whether Rule 144A applies; and (6) a brief description of the issue.

Questions/Further Information

Questions concerning the TRACE amendments should be directed to tracefeedback@nasd.com; [Elliot Levine](#), Chief Counsel, Market Operations, Regulatory Services and Operations, at (212) 858-4174; or [Sharon K. Zackula](#), Assistant General Counsel, Office of General Counsel, Regulatory Policy and Oversight, at (202) 728-8985.

Qualifications/Testing/Continuing Education

New Series 51 Examination

On September 30, 2002, the Municipal Securities Rulemaking Board (MSRB) filed a proposed rule change with the Securities and Exchange Commission for the MSRB's new Municipal Fund Securities Limited Principal Qualification Examination (Series 51), as well as an amendment to Rule G-3, on professional qualifications. Administration of the new Series 51 examination began on January 2, 2003.

The amendment to Rule G-3 will extend to March 31, 2003, the transition period during which Series 24 and Series 26 principals may continue to supervise municipal fund securities activities without further qualification. This extension will provide a three-month period during which candidates can take and pass the Series 51 examination. **Under the amendment, all municipal fund securities limited principals will be required to have taken and passed the Series 51 examination by April 1, 2003.** This new exam requirement will not apply to individuals who are functioning as municipal securities principals or general securities sales supervisors, and who have passed either the Municipal Securities Principal Examination (Series 53) or the General Securities Sales Supervisors Examination (Series 8 or Series 9/10).

The New Series 51 Study Outline

A [study outline](#) has been prepared to serve as a guide to the subject matter tested by the Municipal Fund Securities Limited Principal Examination (Series 51). It lists the topics covered by the examination and provides sample questions similar to the type used in the examination.

Registration Procedures

An application must be submitted to NASD in order to register an individual as a Municipal Fund Securities Limited Principal. For persons already registered in one of the prerequisite categories (Series 24 or Series 26), the member need only submit page one of Form U-4 requesting Municipal Fund Securities Principal (FP) registration. For new employees, a member must submit a full Form U-4 application requesting all necessary registrations and any other documents required for registration. The Series 51 Exam fee is \$75 and the registration fee for new applicants is \$85.

For more information on this new examination requirement, contact [Carole Hartzog](#), Assistant Director, NASD Testing and Continuing Education Department, at (240) 386-4678. This information is also available on the [MSRB Web Site](#).

Reminder: Disciplinary Actions May Reset Regulatory Element Date

Registered persons in certain registration categories are required to complete a Continuing Education Regulatory Element computerized training session within 120 days of the second anniversary of their initial securities registration date, and every three

years thereafter, for as long as they remain in the securities business. The date of a person's initial securities registration is known as the base date. However, a "significant disciplinary action" will change a person's base date from the initial securities registration date to the "effective date" of the disciplinary action. Additionally, a person who may have been grandfathered out of the requirement to complete the Regulatory Element training session may be required to do so after he or she has been the subject of a significant disciplinary action. A "significant disciplinary action" is defined in Conduct Rule 1120 as:

- Any statutory disqualification as defined in Section 3(a)(39) of the Securities Exchange Act of 1934;
- A suspension, or the imposition of a fine of \$5,000 or more for violation of any provision of any securities law or regulation, or any agreement with or rule or standard of conduct of any securities self-regulatory organization, or as imposed by any such regulatory or self-regulatory organization in connection with a disciplinary proceeding; or
- An order as a sanction in a disciplinary action to re-enter the Continuing Education Program by any securities governmental agency or securities self-regulatory organization.

The "effective date" of the disciplinary action is approximately the 45th day after the *Date of Action* specified in the official disciplinary decision document. Completion of a Regulatory Element training session immediately within 120 days of this new base date is then required. Further information is available at the Securities Industry/Regulatory Council on Continuing Education [Web Site](#).

Testing Update

Excellence in Service Award for Testing Centers

NASD established an Excellence In Service Award Program for those centers that consistently achieve excellence in the areas of customer service and performance.

The awards are made in April, June, October, and January for the previous calendar quarter.

The Excellence In Service Award winners for fourth quarter 2002 are:

NOTE: A number beside the city name represents the number of consecutive quarter awards.

Ft. Smith AR
3 Sarasota, FL
Troy MI
2 Ithaca NY
8 Cuyahoga Falls OH
2 North Wales PA
Columbia SC
16 Memphis TN

Little Rock AR
Tampa FL
4 Utica MI
7 Melville NY
3 Niles OH
12 Pittsburgh (N. Hills) PA
Clarksville TN
Puyallup WA

4 Orlando FL
Baton Rouge LA
Jackson MS
Rector St. NY
11 Oklahoma City OK
Warwick RI
Knoxville TN
S. Charleston WV

Web-Based Appointment Scheduling and Confirmation System for Online Exam Scheduling is Now Available

Firms and employees of firms who have registered through Web CRD to take a computer-based exam can now schedule and confirm exam appointments through Prometric's online Appointment Scheduling and Confirmation Web Site.

A sponsoring firm of the candidate must first request an examination on Web CRD before the candidate or firm can schedule an exam appointment using the online scheduling system.

NOTES:

- 1. If the candidate requires additional time due to English As a Second Language (ESL), the appointment MUST be made through the toll-free number at 1-800-578-6273. The online system does not have the capability to add time to the standard appointment hours.**
- 2. If the appointment needs to be rescheduled or canceled, the candidate or firm MUST call the toll-free number at 1-800-578-6273. Appointments CANNOT be rescheduled or canceled via the Web Site.**

Two methods for accessing the Web Site are available:

www.nasdr.com/2630_confirm.asp, which will provide instruction for using the Web Site, and a link to the scheduling and confirmation Web Site

OR

www.2test.com, which will go directly to Prometric's Web Site.

Test Center Locations - Domestic And International

A [current list](#) of all test center locations, both domestic and international, is published on the NASD Web Site. Access our Web Page to get up-to-date location information.

Questions about this article may be directed to [Linda Christensen](#), Member Regulation, NASD, at 610-627-0377.

Certification Testing & Continuing Education Delivery Location List

Current as of January 2003

[AL](#) | [AK](#) | [AR](#) | [AZ](#) | [CA](#) | [Canada](#) | [CO](#) | [CT](#) | [DC](#) | [DE](#) | [FL](#) | [GA](#) | [HI](#)
[IA](#) | [ID](#) | [IL](#) | [IN](#) | [KS](#) | [KY](#) | [LA](#) | [MA](#) | [MD](#) | [ME](#) | [MI](#) | [MN](#) | [MO](#) | [MS](#) | [MT](#)
[NC](#) | [ND](#) | [NE](#) | [NH](#) | [NJ](#) | [NM](#) | [NV](#) | [NY](#) | [OH](#) | [OK](#) | [OR](#) | [PA](#) | [PR](#) | [RI](#) | [SC](#) | [SD](#)
[TN](#) | [TX](#) | [UT](#) | [VA](#) | [Virgin Islands](#) | [VT](#) | [WA](#) | [WI](#) | [WV](#) | [WY](#)

Alabama

Birmingham	205-871-7444
Decatur	205-350-8324
Dothan	334-677-6334
Mobile	334-344-6284
Montgomery	334-262-0043

Alaska

Anchorage	907-276-6007
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Arizona

Goodyear	623-932-7800
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Arkansas

Fort Smith	501-484-0702
Little Rock	501-663-8280

California

Anaheim	714-637-7894
Atascadero	805-462-8308
Brea	714-255-1141
Camarillo	805-389-6595
Culver City	310-337-6696
Diamond Bar	909-861-1146
Fair Oaks (Sacramento)	916-961-7323
Gardena	310-329-1844
Glendale	818-545-7383
Irvine	949-552-0563

La Mesa	619-668-2121
Rancho Cucamonga	909-944-9763
Redlands	909-792-2145
Riverside	909-353-8600
San Diego	858-526-0858
San Francisco	415-362-1311
S. San Francisco	650-244-9558
San Jose	408-246-0072
Santa Rosa	707-528-6000

Canada

Calgary, AB	403-777-1365
Etobicoke, ON	416-236-2629, Ext. 221
Halifax, NS	902-422-7323
Montreal, QU	514-876-8818
Richmond, BC	604-231-1966
Saskatoon, SK	306-978-7323
Whitby, ON	905-404-1818
Winnepeg, MB	204-988-5056

Colorado

Colorado Springs	719-593-1272
Englewood	720-493-5254
Longmont	303-485-3218

Connecticut

Glastonbury	860-633-7236
Hamden	203-287-9677
Norwalk	203-847-0031

Delaware

Wilmington	302-998-3817
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District of Columbia

Washington D.C.	202-955-5887
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Florida

Casselberry	407-671-2332
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Coral Springs	954-340-2750
Davie	954-423-0782
Ft. Myers	941-275-1130
Gainesville	352-371-6891
Hollywood	954-967-0443
Jacksonville	904-739-3000
Maitland/Orlando	407-875-8118
Sarasota	941-923-9399
Tallahassee	850-386-8707
Tampa	813-289-1246
Temple Terrace (Tampa)	813-989-9988

Georgia

Atlanta	770-493-9813
Augusta	706-868-1888
Jonesboro	770-478-5356
Macon	912-405-7423
Marietta	770-980-1117
Savannah	912-354-2660
Valdosta	912-245-1069

Hawaii

Honolulu	808-441-5000/5050
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Idaho

Boise	208-322-3555
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Illinois

Carbondale	618-529-4664
Chicago	312-641-7301
Homewood	708-798-0238
Northbrook	847-559-2461
Peoria	309-683-4653
Springfield	217-546-0381
Sycamore	815-748-0074

Indiana

Evansville	812-479-6855
Fort Wayne	260-481-4153
Indianapolis	317-257-7546
Indianapolis	317-486-4541
Lafayette	765-447-0626
Merrillville	219-736-1113
Mishawaka-Old S. Bend	219-254-1055
Terre Haute	812-232-6348

Iowa

Bettendorf	563-359-1001
Urbandale	515-867-8500

Kansas

Topeka	785-272-7500
Wichita	316-651-5350

Kentucky

Lexington	859-268-3338
Louisville	502-423-0478

Louisiana

Baton Rouge	225-293-8489
Bossier City	318-742-7349
Metairie	504-834-2155

Maine

Orono	207-581-1708
Portland	207-775-5812

Maryland

Baltimore	443-923-6400
Bethesda	301-718-9893
Columbia	410-740-8137
Lanham	301-552-3400
Pikesville	410-486-9045
Salisbury	410-341-4100
Towson	410-823-9788

Massachusetts

Boston	617-345-8980
Braintree	781-380-3876
Brookline	617-264-4152
Burlington	781-221-7860
E. Longmeadow	413-525-4901
Worcester	508-853-7250

Michigan

Ann Arbor	734-477-6970
Grand Rapids	616-957-0368
Lansing	517-372-7413
Livonia	734-462-2750
Portage	616-321-8351
Troy	248-643-7323
Utica	810-739-0270

Minnesota

Duluth	218-723-1494
Edina	952-820-5010
Rochester	507-292-9713
Woodbury	651-702-6791

Mississippi

Jackson	601-366-6400
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Missouri

Ballwin	636-394-7742
Hazelwood	314-895-4826
Jefferson City	573-761-7517
Lee's Summit	816-525-4500
Springfield	417-882-0740
St. Joseph	816-671-9900

Montana

Billings	406-656-4646
Helena	406-443-9205

Nebraska

Columbus	402-564-2862
Lincoln	402-465-8800
Omaha	402-334-9449

Nevada

Las Vegas	702-889-4132
Reno	775-829-2700

New Hampshire

Portsmouth	603-433-6800
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New Jersey

Deptford	856-384-4744
Edison	732-248-5469
Fairlawn	201-475-1670
Hamilton Township	609-631-9794
Toms River	732-349-4609
Union	908-964-2862

New Mexico

Albuquerque	505-296-0609
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New York

Albany	518-438-6762
Amherst/Buffalo	716-565-0570
East Syracuse	315-433-9038
Garden City/Long Island Area	516-746-7367
Ithaca	607-277-4821
Melville	631-845-9063
New York	212-631-0020
NYC Manhattan Area	212-760-1137
NYC Midtown Area	212-986-5661
NYC Wall Street Area	212-566-7055
Rego Park	718-997-6356
Rochester	716-385-4810
Staten Island	718-980-3079

Vestal	607-798-1715
Wappingers Falls	845-298-8378
White Plains	914-289-0437

North Carolina

Asheville	828-253-4224
Charlotte	704-364-7758
Greensboro	336-854-4230
Greenville	252-756-0342
Raleigh	919-846-1933
Wilmington	910-392-0891

North Dakota

Bismarck	701-224-1171
Fargo	701-293-1234

Ohio

Akron (Cuyahoga Falls)	330-922-5587
Cincinnati	513-671-7030
Columbus	614-451-4131
Dayton	937-435-8417
Hilliard	614-529-4232
Lima	419-331-7323
Mentor	440-255-0055
Niles	330-652-1886
Strongsville	440-238-0530

Oklahoma

Oklahoma City	405-843-8378
Tulsa	918-747-9333

Oregon

Eugene	541-485-4589
Milwaukie	503-659-9575
Portland	503-254-2009

Pennsylvania

Allentown	610-791-5320
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Clark Summit	570-586-4362
Erie	814-864-6100
Harrisburg	717-652-0143
Lancaster	717-392-2193
North Wales (Montgomeryville)	215-412-7822
Philadelphia	215-238-8380
Pittsburgh	412-367-4620
Pittsburgh	412-247-4463
York	717-755-7471
Puerto Rico	
Guaynabo	787-706-7640
Rhode Island	
Warwick	401-738-9172
South Carolina	
Charleston	843-766-5599
Columbia	803-354-9221
Greenville	864-676-1506
South Dakota	
Sioux Falls	605-362-4875
Tennessee	
Chattanooga	423-894-6249
Clarksville	931-647-2003
Franklin	615-790-5018
Knoxville	865-690-2677
Madison (Nashville)	615-860-0376
Memphis	901-756-1425
Texas	
Abilene	915-698-7858
Amarillo	806-463-2379
Arlington	817-572-6690
Austin	512-441-1978
Beaumont	409-899-9798

Corpus Cristi	361-993-3793
Dallas	972-385-1181
El Paso	915-587-7323
Houston (Kingwood)	915-587-7323
Mesquite	972-686-3310
Midland	915-520-9418
San Antonio	210-494-7263
Sugar Land	281-491-9200
Tyler	903-510-2842
Waco	254-772-2467
Webster	281-557-0358
Utah	
Ogden	801-394-5990
Orem	801-226-5544
Salt Lake City	800-578-6273
Vermont	
Williston	802-872-0845
Virgin Islands	
St. Croix	340-773-5751
Virginia	
Fairfax	703-204-9060
Glen Allen	804-346-8777
Lynchburg	804-832-0778
Newport News	757-873-0208
Roanoke	540-344-3688
Washington	
Mountlake Terrace	425-774-3922
Puyallup	253-848-0771
Spokane	509-467-8715
West Virginia	
Morgantown	304-293-0699
South Charleston	304-345-1986

Wisconsin

Fox Point 414-540-2223

Madison 608-231-6270

New Berlin 262-796-0808

Racine 414-554-9009

Wyoming

Casper 307-472-4888

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