

December 27, 2010

Via email to pubcom@finra.org

Ms Marcia E Asquith
Office of the Corporate Secretary
Financial Industry Regulatory Authority
1735 K Street, N.W.
Washington, D.C. 2000-1506

Re: FINRA Regulatory Notice 10-54

Dear Ms. Asquith:

Edward Jones appreciates the opportunity to provide comments on the FINRA concept proposal regarding *Disclosure of Services and Conflicts and Duties* as provided in FINRA Regulatory Notice 10-54. We commend and support FINRA's efforts to promote meaningful disclosure standards which are critical to investor education and protection.

Edward Jones is a large retail financial services firm, serving the needs of nearly seven million U.S. investors through personalized, face-to-face service provided by over 12,000 financial advisors. We focus on serving the needs of the serious, long-term individual investor by promoting an investment philosophy that emphasizes quality and diversification.

While Edward Jones supports FINRA's efforts to enhance disclosure to investors with respect to products and services, conflicts of interests and responsibilities, we provide comments on certain aspects of the current proposal impacting investors for your consideration.

Relationship to Fiduciary Standard of Care

While Edward Jones applauds FINRA's effort to move this process of enhanced disclosure along, Edward Jones respectfully submits that FINRA should not advance this concept proposal until after the SEC completes its study and implements recommendations regarding the obligations of brokers, dealers and investment advisers as required by Section 913 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 913, among other things, requires the SEC to consider how to "facilitate the provision of simple and clear disclosures to investors regarding the terms of their relationships, with brokers, dealers, and investment advisers, including any material conflicts of interest." Given the common goals of these proposals, we believe they must be considered in a coordinated fashion by the SEC to ensure the new requirements promote consistent and clear disclosures for investors.

Overall Scope of Disclosure Should Be Defined by Regulatory Outcomes Intended

While FINRA clearly states that this concept proposal is designed "in anticipation of satisfying any resultant rulemaking mandates and to enhance retail investors' understanding of the business, relationships and conflicts of their brokers," the current proposal focuses on potential disclosure of vast array of topics including services, products, remuneration, conflicts, and limitations of services. To help provide the most beneficial

result for investors, Edward Jones recommends FINRA clearly enumerate the outcomes desired by providing enhanced disclosure to investors to the extent possible and use these outcomes to help guide the overall scope of required disclosure.

Meaningful and Timely Disclosure Characteristics

Edward Jones supports FINRA's efforts to consider optimal disclosure methods that may provide the most meaningful disclosure to the retail client making decisions regarding their financial services provider and/or investments. In order to make well-informed decisions, retail clients benefit from clear, concise and useful disclosure, free from details that may often overwhelm the most important facts. As such, a layered or "two-tiered" approach would provide the most meaningful disclosure where clients are provided relevant and important summary information at the time it is most important in their decision-making as long as the timing of such disclosure here does not make disclosure impractical or unreasonable given the realities of the market and the client relationship.

Edward Jones supports web-based delivery for investors wishing to access the most detailed disclosure information. Not only does web-based disclosure provide timely and effective delivery of information, it also provides the optimal means to provide layered disclosure to clients, providing links for clients to access additional information should they choose.

Finally, Edward Jones supports annual summary disclosure updates to clients through the delivery means chosen by the client for regulatory notifications, making more detailed updates readily-accessible to clients.

Consistent Disclosure for Clients Receiving Retail Investment Advice

With SEC responsibilities for both Investment Advisers and Broker Dealers, Edward Jones believes the disclosures contemplated by the concept proposal should apply equally to all clients receiving retail investment advice.

Edward Jones appreciates the opportunity to provide comments on this concept proposal to provide investors with more meaningful information about their financial services provider. If you have any questions regarding the comments in this letter please contact me at 314-515-9734.

Sincerely,



Laura Ellenhorn
Principal, Compliance

CC: Jim Tricarico, General Counsel
Pam Cavness, Chief Compliance Officer
Jesse Hill, Office of Regulatory Counsel