As an independent financial advisor, I support reasonable efforts to preserve market integrity, protect investors and eliminate rogue brokers from the industry. However, I`m concerned that the broad ranging initiative described in FINRA`s CARDS concept release (RN 13-42) goes too far in pursuit of these important goals.

The CARDS proposal would allow FINRA to automatically collect account, activity, and security identification information from clearing firms on a daily or weekly basis. The purpose of CARDS is to assist FINRA in assessing business conduct patterns and trends in the industry, and to assist firms with their compliance and supervisory programs. Unfortunately, I believe the data security risk, data standardization challenge and cost of CARDS far outweigh the expected benefits.

Specifically, I`m concerned about the following:

- Data Security: A database containing clients` trading history and other data will be an extremely attractive target. Even if the database does not contain their personally identifying information, I`m concerned that the collection of account numbers and other data elements will leave my clients vulnerable to hackers. This is an unnecessary risk.

- Data Standardization: In order to simplify and standardize data collection, it would appear FINRA will impose data standards that specify the format of client suitability and other data elements. Since the data currently contained on my clients` new account form is unlikely to meet these specifications, I`m concerned FINRA will require me to repaper all of my client accounts. This would be a very large and costly undertaking that would not benefit my clients.

- Cost: I expect the cost of implementing and maintaining CARDS to be very high. These costs will inevitably be passed along by the clearing firms and my broker-dealer to me and my clients. Higher costs have the effect of limiting my ability to service smaller accounts. It would be unfortunate if I had to abandon my clients with smaller accounts in order to remain profitable after CARDS is established.

For these reasons, I believe the CARDS concept proposal is simply unworkable. Therefore, I hope FINRA will pursue other means of addressing its regulatory oversight needs.

Thank you for considering my comments.

Sincerely,

1.	03/05/14	Richard Hellmold
2.	03/05/14	James Mabbutt
3.	03/05/14	Dale White
4.	03/05/14	Michael Freedman
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28.	03/05/14	Wendy West-Krauch
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529.	03/20/14	Joseph Bernheimer
530.	03/20/14	Craig Jensen
531.	03/20/14	Thomas Pringle
532.	03/20/14	Gerald Flanery
533.	03/20/14	Andrea Ritch
534.	03/20/14	Paul Wakefield
535.	03/20/14	Rick Mayo
536.	03/20/14	Samantha Sennett
537.	03/20/14	Scott Sprague
538.	03/20/14	Rick Meiss
539.	03/20/14	Thomas Bonito
540.	03/20/14	Phil Schramm
541.	03/20/14	Diana Heu
542.	03/20/14	Nicole Hoekstra
543.	03/20/14	Lavon Williams
544.	03/20/14	Anthony Panto
545.	03/20/14	Charlotte Jay
546.	03/20/14	Robert Thomas
547.	03/20/14	David Cutshall
548.	03/20/14	Ron Ring
549.	03/20/14	Walter M. Butler
550.	03/20/14	David Sullwold

551.	03/20/14	Bruce DeShazo
552.	03/20/14	Richard Morrow
553.	03/20/14	Jay Weintraub
554.	03/20/14	Bradley Brown
555.	03/20/14	Karen Flynn
556.	03/20/14	WilliamRussell
557.	03/20/14	Robert Auld
558.	03/20/14	David Osachoff
559.	03/20/14	John Ross
560.	03/20/14	Dennis Highsmith
561.	03/20/14	David Draper
562.	03/20/14	Rick Sany
563.	03/20/14	Patrick Thurman
564.	03/20/14	Cindy Rounds
565.	03/20/14	Karen Campbell
566.	03/20/14	Timothy Ferris
567.	03/20/14	Chad Hoffmann
568.	03/20/14	Matthew Poole
569.	03/20/14	Michael Moss
570.	03/20/14	Dale Wright
571.	03/20/14	Andre McDonald
572.	03/20/14	Michael Rundlett
573.	03/20/14	George Scott
574.	03/20/14	Bobby McGowan
575.	03/20/14	Rayna Elmendorf

576.	03/20/14	Jack Dvir
577.	03/20/14	Vicky Chow
578.	03/20/14	John L. Simmons
579.	03/20/14	Jorge Garrido
580.	03/20/14	Eric Rechtin
581.	03/20/14	Thom Carroll
582.	03/20/14	Jed Friedman
583.	03/20/14	James Tesch
584.	03/20/14	Clay Heil
585.	03/20/14	Don Scholl
586.	03/21/14	Anthony Fauci
587.	03/21/14	Robert L. Franer Jr.
588.	03/21/14	Peter Vescovi
589.	03/21/14	Edward McCown
590.	03/21/14	Suzan Ross
591.	03/21/14	Luther Ensminger Jr.
592.	03/21/14	Kenneth Fahringer
593.	03/21/14	Justin Littlefield
594.	03/21/14	John Barbour
595.	03/21/14	Larry Gill
596.	03/21/14	Stephen Mattocks
597.	03/21/14	Richard Clouse Jr.
598.	03/21/14	Michael Sterling
599.	03/21/14	Ryan Woytcke
600.	03/21/14	Rick Dobberpuhl

601.	03/21/14	Richard Byrd
602.	03/21/14	Darrell Phillips
603.	03/21/14	Susan Silvers
604.	03/21/14	Gary Kovach
605.	03/21/14	Bradford Lee
606.	03/21/14	Nanci Lotvin
607.	03/21/14	Richard Jones
608.	03/21/14	Thierry V. Sommer
609.	03/21/14	Joseph Russo
610.	03/21/14	Michael Lomas
611.	03/21/14	Susannah M. Ryan
612.	03/21/14	William H. Cross
613.	03/21/14	Kevin Hermening
614.	03/21/14	Artur Stypula
615.	03/21/14	Stephen Smith
616.	03/21/14	Craig Ruffolo
617.	03/21/14	Ken Odom
618.	03/21/14	Darrick Munsch
619.	03/21/14	Richard Benson
620.	03/21/14	Kenneth Hamada
621.	03/21/14	David Hirose
622.	03/21/14	Barry Shapiro
623.	03/21/14	Julie Segerson
624.	03/21/14	Lisa Lagorioi
625.	03/21/14	George McGehee

626.	03/21/14	Wayne Locke
627.	03/21/14	R. Kevin Dickey
628.	03/21/14	Staci Scharadin
629.	03/21/14	Mark Chamberlain
630.	03/21/14	Regan Ertle
631.	03/21/14	Omar Cujar
632.	03/21/14	Louis Bordonaro
633.	03/21/14	Rebecca Hannan
634.	03/22/14	Grace Tumang
635.	03/22/14	Anthony J. Zalesky
636.	03/24/14	Kevin Berglund
637.	03/24/14	Betty Miller
638.	03/24/14	Sheryl Stephens
639.	03/24/14	Timothy A. Rudy
640.	03/24/14	Stephen H. Seplowe
641.	03/25/14	David Cutshall
642.	03/25/14	Wayne Guidotti
643.	03/25/14	Gerald E. Chambers
644.	03/25/14	Danny J. Barfield
645.	03/25/14	David Bogle
646.	03/25/14	B. Patterson Robson, Jr.
647.	03/31/14	Steven Blake
648.	04/07/14	Joanne O. Provost
649.	04/07/14	William LaVanne
650.	04/07/14	Benjamin Newhouse

651.	04/10/14	John Hance
652.	04/17/14	Steven Stillman
653.	08/28/14	Roy Holtz