

Marcia E. Asquith, Office of the Corporate Secretary, FINRA

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.

I have listed some of my concerns that, in my opinion, overshadow the intended benefits.

- **Data Security:** Creating a database containing clients' trading history, account numbers and other data will leave my clients vulnerable to hackers.

- **Data Standardization:** In order to simplify and standardize data collection, it would appear FINRA will impose data standards that may very well drive up costs. It could 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. Who ultimately pays for these costs? Answer: clearing firms, broker-dealer, me and my clients. The customer ends up losing because the expense to service smaller accounts. Not everyone trying to save for retirement is fortunate enough in today's economy to accumulate a million dollars or more. It would be unfortunate if I had to abandon my clients with smaller accounts in order to remain profitable after CARDS is established.

It appears to me that 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 opinion.

Sincerely,

Harold W. Tomlinson