

Dear FINRA:

I think that this proposal is of no value and hope that it does NOT pass. All this does is increase the regulatory burden and costs for the small firms AGAIN. The Operations Principal is responsible for all personnel in the back office and it is their responsibility to make sure that the training is accomplished for that particular job. Requiring registration and CE does NOTHING but increase costs and makes hiring clerical help almost impossible without spending money to register them. Then, this becomes a barrier to new applicants for operations positions. In the small firms, where the back office deals with all aspects of operations, it would be necessary for everyone to be registered at considerable expense with no additional safety to the clients. The reality is that the Operations Principal is responsible for making sure that all personnel, whether dealing with clients or not, is trained and doing the job correctly.

Martin Nelson

President

Martin Nelson & Co., Inc.