

I am responding to the request for comment in April 2005 Notice to Members on the proposed advertising filing requirement of all TV, video and radio advertising of 15 seconds or longer. I agree that there have been media advertisements that are questionable, if not flagrant violations of the advertising rules which could have been stopped before it reached the public if this rule were in place. There is a need for a change in this area. I hope that you will consider making the final requirement less broad, excluding generic ads that just highlight the firm or that do not mention specific product features. My firm uses 30-60 second generic radio ads to attract new employees and/or clients. We basically use the ads for name recognition within our community and do not use them for any specific product or department. I would hope that these type ads would be exempt from the 10 day prior filing requirement and that the advertising principal could sign off on these generic ads.

Thank you for your consideration of my comments.

Jennifer Carty Scola
Chief Operating Officer, Executive VP
Carty & Company, Inc.