I take this opportunity to reiterate my comments as they were previously requested and provided. Finra doesn't need this proposed rule however much the staff wants such. Time to push back on behalf of the membership and this firm. Let the nyse rule covering floor rumors stand but do not grant such a vague rule as proposed as there will be a temptation to widen the scope and misuse such. The rule against covered conduct is handled by 2110, operating an ethical enterprise.

## **Daniel W. Roberts**

President/CEO 57 Post Street, Suite 614 San Francisco, CA 94104-5023 www.robertsryan.net