



Susan Hechtlinger  
Chief Compliance Officer

SunTrust Investment Services, Inc.  
303 Peachtree Center Avenue  
Suite 140  
Atlanta, GA 30303  
Tel 404.813.7712  
Fax 404.813.7213

June 05, 2009

Ms. Marcia E. Asquith  
Office of the Corporate Secretary  
FINRA  
1735 K Street NW  
Washington, DC 20006-1506

**RE: FINRA Regulatory Notice 09-22; Personal Securities Transactions**

Dear Ms. Asquith:

SunTrust Investment Services, Inc. ("STIS") appreciates the opportunity to comment on the above-referenced matter. STIS is a registered broker/dealer under the Securities Exchange Act of 1934 and a FINRA member firm.

Generally, STIS is in favor of the proposed consolidation of NASD and NYSE rules.

However, we believe that Proposed FINRA Rule 3210 ("PFR 3210") is overly burdensome and will not provide the benefits to the industry that FINRA seeks through its implementation. As a result, STIS has set out its comments to PFR 3210.

**Prior Written Consent Requirement – PRF 3210(a)**

Based in large part on NYSE Rule 407, PFR 3210(a) prohibits any associated person, without the prior written consent of his or her employing member from opening or otherwise establishing at another member firm, or at any other financial institution, any account in which securities transactions can be effected and in which such associated person has a personal financial interest. The proposed rule further adds a new requirement that, as a condition to granting prior written consent, the employing member must instruct the associated person to have the executing member provide duplicate account statements and confirmations to the employing member.

Under current NASD rules, a member firm has the discretion to determine what if any documentation they want to receive from their associated person's executing financial institution. The proposed rule would require members to obtain confirmations and monthly statements for all investment accounts including trusts and third party investment advisory relationships. In both of

---

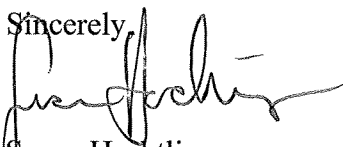
Securities, Insurance, Investment Products and Services are offered by or through SunTrust Investment Services, Inc., a SEC registered investment advisor and broker/dealer affiliate of SunTrust Banks, Inc., and member of the NASD and SIPC. Securities, Insurance, Investment Products and Services:

• Are Not FDIC or Any Other Government Agency Insured • Are Not Bank Guaranteed • May Lose Value

these situations, the associated person has no control or trading authority over the activity in the account. Since most third party accounts are actively managed, it is common for trading activity to occur daily. These types of relationships can generate a significant number of transactions. It is unclear what the benefit of receiving and supervising these transactions would be. The risk associated with not reviewing these types of transactions seems minimal yet the effort would be vast, especially if third parties are not required to provide the information electronically. Instead of requiring duplicate confirmations for these third party relationships, consideration should be given to require member firms only to obtain monthly statements.

We sincerely appreciate the opportunity to submit our comment letter to PFR 3210. STIS desires to assist FINRA in molding a workable personal securities transaction rule that benefits the industry without imposing overly burdensome obligations on the member firms. If you have any questions regarding this matter, please do not hesitate to call me at (404) 813-7713.

Sincerely,



Susan Hechtlinger  
Chief Compliance Officer