



3330 190th NE Drive, Suite 1418, Aventura, Florida 33180

June 5, 2009

Marcia E. Asquith
Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington DC 20006-1500

In re: *Proposed FINRA Rule 3210*

Dear Ms. Asquith:

Taurus Compliance Consulting, LLC appreciates the opportunity to comment on proposed FINRA Rule 3210, which would consolidate NASD Rule 3050 and incorporate NYSE Rule 407.

Proposed FINRA Rule 3210, as detailed in Regulatory Notice 09-22, pertains to the proper supervision of the personal securities transactions for or by associated persons.

Taurus Compliance Consulting, LLC, hereby known as “Taurus”, generally encourages all proposals which create or consolidate sensible obligations and rules for a member firm in accordance with the development of the FINRA Consolidated Rulebook. Taurus strongly believes that streamlining and consolidation is beneficial in providing clarity to the industry and will assist our clients in the development and implementation of more uniform policies, procedures and compliance controls.

1. Methodologies currently employed to obtain information pursuant to existing rules and the processes and controls currently implemented upon receipt of the required information

Taurus strongly believes that registered firms should continue to have the flexibility in choosing how it receives duplicate account statements from the executing firm of an employed registered representative. The processes and controls currently implemented by Taurus clients are highly dependent on whether the firm requires that outside brokerage accounts be held at the employing firm’s clearing agent. If this is so required, then our clients are able to maintain electronic databases and are able to monitor unusual or suspicious trading activity and generate exception report generated by the firm’s clearing agent. This is often the most effective method used by firms in monitoring trading activity.

However, some firms still receive hard copy duplicate account statements through the mail, a compliance principal is responsible for reviewing and monitoring all registered representative trading activity in the account statements. While this process may be cumbersome and labor

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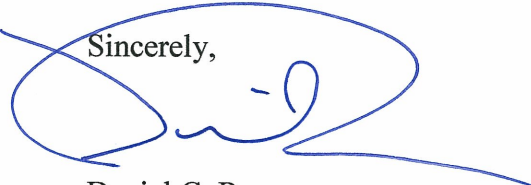
intensive, many firms still employ this approach. Taurus would like to stress that registered firms be given flexibility in choosing how it approaches this review process. For very small firms with very few registered representatives, it may be more practical for that firm to continue to receive duplicate account statements in the mail for manual review by a compliance principal. Larger firms with a substantial number of registered representative employees may find it more effective to only permit employees to have brokerage accounts at the firm's clearing partner, thereby allowing electronic exception reports to be generated by the executing firm for review by the employer firm.

As always, Taurus would like to emphasize that smaller firms may not have the technological resources to implement many of the electronic processes that larger firms possess.

Taurus Compliance Consulting, LLC exists to provide our clients with the knowledge and expertise necessary to have the most robust compliance structure possible. We constantly strive to strike a balance between customer protection and market efficiency. As stated earlier, Taurus is a proponent of rule proposals that streamline, simplify, and clarify the compliance obligations of a member firm.

Please feel free to contact me at 1.800.388.8822 (Ext. 125) or drome@tauruscompliance.com if you have any questions or would like to further discuss this proposed rule change. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Daniel C. Rome', enclosed within a large, loopy blue oval that extends to the right.

Daniel C. Rome
General Counsel