

Thank you for the opportunity to comment on the proposed suitability and know your customer rule.

As a general comment, the proposal looks pretty good to me. However, I do want to comment on two aspects. First, the rule should cover only those recommendations concerning securities and investment strategies relating to securities. I believe that expansion of this rule beyond securities and investment strategies relating to securities is ill-advised; I very much prefer the rule to cover securities—not non-securities.

Second, this rule should be directly correlated with the requirements of NASD Rule 2310, in terms of the required information that must be obtained for a non-institutional customer. This will eliminate confusion when opening a new account and gathering information from a non-institutional customer. As a further note, it would be nice if NASD Rule 3110(C) could also be directly correlated to the terms of this rule and NASD Rule 2310—especially since Finra has recently designed and recommended a customer new account template, which seems to incorporate much of this required information.

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