



FARMERS

FINRA

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

Rod Goeman Agency  
Insurance and Financial Services Agent  
120 East Center St., Suite 1  
Madison, SD 57042  
Phone: 605-256-6334  
Fax: 605-256-0101  
Home: 605-256-4001

Office of the Corporate Secretary-Admin.

June 23, 2009

JUN 29 2009

FINRA  
Notice to Members

Dear Marcia:

Expanding FINRA's suitability recommendations to products that do not involve securities would be unnecessary and lacks jurisdictional oversight in recommendations that FINRA has no authority over.

As a licensed insurance agent and registered representative of Farmers Financial Solutions, LLC, this proposal would appear to be a knee-jerk reaction at best.

I firmly believe that people who promote unsuitable sales and engage in misleading sales practices should be aggressively prosecuted and subject to fines and sanctions. However, FINRA does not have jurisdiction over products and services which are not securities, and neither FINRA nor broker/dealers have the resources or product-specific expertise necessary to oversee non-securities transactions. In my opinion, FINRA's authority should not be expanded to include non-securities products and services.

I urge you not to expand FINRA's suitability obligations to include recommendations that do not involve securities. Thank you for considering my views on this issue.

Sincerely,

Rod L. Goeman-Insurance and Financial Solutions Representative