

From: Roland X Szukhent [Roland.X.Szukhent@ampf.com]
Sent: Tuesday, June 23, 2009 1:47 PM
To: Comments, Public
Subject: FINRA Regulatory notice 09-25

Honorable Sirs,

I am a licensed insurance professional and registered representative.

I strongly object to expanding FINRA's suitability obligations to recommendations that do not involve securities.

Yes - Aggressively prosecute and penalize any individual that would provide unsuitable sales and engage in any misleading sales practices, but 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.

FINRA's authority should NOT be expanded to include non-securities products and services.

In addition, insurance and other non-securities products are already subject to comprehensive regulation at the state level, through the efforts of state insurance departments and other state regulators.

Adding FINRA rules to these products will result in a conflicting and confusing regulatory system, and in the end consumer protection, the main goal, will be diminished.

It would be inappropriate for FINRA to expand or revise current suitability issues while this whole debate is still just getting underway, who knows what bigger or sweeping changes may come in the next few months.

I urge you NOT to expand FINRA's suitability obligations to include recommendations that do not involve securities.

Kindly consider my views on this issue, as I know they reflect the majority of compliant professionals in this industry.

Thank You

