



ING FINANCIAL PARTNERS

Robert B. Joki, CLU
Registered Representative

June 25, 2009

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

Reference: FINRA Regulatory Notice 09-25

Dear Commissioner Asquith:

I have been reading with great concern the proposed FINRA regulatory notice 09-25, wherein it is proposed that all business be regulated through FINRA. I strongly oppose this regulatory notice for the following reasons.

I have been involved in the life insurance business since March of 1969 and the securities business since September of 1973. As part of my insurance operation, we regularly get involved in the sale of life insurance, critical illness insurance, long term care insurance, disability income insurance and overhead expense coverage. I do not handle property/casualty insurance. When we submit an application, sufficient information must be sent to an underwriter whose job includes confirming that the insurance is suitable for the customer and affordable for the customer.

As an example in the critical illness, disability income and overhead expense arena, as part of the underwriting process we are required to provide financial information. This usually includes two years of income tax return to make sure the amount of coverage is appropriate for the individual's financial situation.

As an example in the life insurance area, financial information is generally not required on amounts of insurance under \$250,000. For larger amounts of insurance, the underwriter wants to be absolutely sure there is financial justification for the purchase of the insurance. It is their intent to make sure the customer is not over insured or paying too much in premiums. In the area of fixed annuities, all of the annuity companies that we work with already require the completion of financial suitability documents by the representative.

My concern is that we would be putting an extra layer of paperwork and bureaucracy into the system. In my opinion this is unconscionable. Right now there is more than adequate underwriting and suitability justification for the non-securities financial products.

Feel free to contact me directly if you wish to discuss any of these topics.

Very truly yours,

A handwritten signature in cursive script that reads "Bob Joki (sn)".

Bob Joki, CLU

RBJ/sn

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