

JAMES L. HARDING & ASSOCIATES, INC.
James L. Harding, CLU®, President

Office of the Corporate Secretary-Admin.

JUL 10 2009

FINRA
Notice to Members

July 1, 2009

Marcia Asquith
FINRA – Office of Corp. Sec.
1735 K Street NW
Washington DC 20006-1506

Re: FINRA Regulatory notice 09-25

Dear Ms. Asquith:

I am a licensed insurance professional and a registered representative entering my 53rd year of active service. I am writing this letter because I strongly object to expanding FINRA's suitability obligations to recommendations that do not involve securities.

FINRA does not 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.

A debate is underway currently on Capitol Hill, in the Administration, the SEC and FINRA, as well as private sector stakeholders regarding the issues concerning the standard of care which broker/dealers and investment advisors owe to their clients. It would be inappropriate for FINRA to expand or revise requirements while this debate is underway since further changes may be made within a matter of months.

For these reasons and others, I urge you not to expand FINRA's suitability obligations to include recommendations that do not involve securities. Thank you for considering my views and for your time.

Sincerely,



James L. Harding, CLU

JLH/cp