From: steve.mcdanald@nmfn.com [mailto:steve.mcdanald@nmfn.com]

Sent: Thursday, June 25, 2009 3:32 PM

To: Comments, Public

Subject: Expansion of Suitability Obligations to Recommendations that do not involve securities.

As a licensed insurance professional and registered representative, I want to express to you in the strongest terms possible that I am OPPOSED to FINRA expanding its suitability obligations to recommendations that do not involve securities!!!!!!!

I absolutely believe that those who promote products and engage in misleading sales practices should be aggressively prosecuted and should be sanctioned by the appropriate existing governing bodies. The problem is that FINRA does not have jurisdiction over products and services that are not securities. Laws and agencies that already exist can deal with those who do not represent my industry as they should. Those agencies already have the expertise and knowledge to protect the consumer and punish those who abuse the system. FINRA does not have the expertise or the resources to police this area of my business and there is no reason to expand its authority and duplicate consumer safeguards at added cost to taxpayers.

Additionally, we have enough regulation already, and FINRA's expansion into the non-securities related area of the financial services business is likely to add confusion and conflict that will ultimately be detrimental to the protection of the consumer which is what FINRA says this is about.

This whole business regarding the standard of care that investment advisors such as myself owe to their clients is in a state of flux as I write this to you. Legislators, the Administration, the SEC and many others are debating this issue right now. FINRA's intrusion into this area right now would be inappropriate and do nothing but add to the confusion and ultimately cost for the consumer. I believe that FINRA should allow the bigger conversation to take place and then present one plan that best protects the consumers' interest that is backed by lawmakers, the Administration and any other pertinent regulators.

As I stated above, I urge you in the strongest terms possible, NOT to expand FINRA's suitability obligations to include recommendations that do not involve securities. Thank you for allowing me to express my views on this subject, and please take them into consideration.

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