
From: Douglas Brauer [mailto:dbrauer@pacificadvisors.com]

Sent: Thursday, June 25, 2009 2:25 PM

To: Comments, Public

Cc: Ralph Sabbagh; David J Umbenhaur; Chris Lema; Austin Bennett; Ted Norton; Eugene Lee

Subject: Expansion of Suitability Obligations to Recommendations that do NOT Involve Securities.

I am shocked that FINRA is expanding its regulatory oversight into areas it does NOT have jurisdiction. To require RRs to submit and provided suitability requirements for NON securities related business is both unfair to the RR and outside of the boundaries of FINRA.

I thought It was completely reasonable to see FINRA become involved with Equity Index Annuities, though many of my peers argued against this infringement. But now to put RRs' recommendations for NON securities related business under the authority of FINRA, goes far beyond reason. Currently there are other regulatory entities that supervise and regulate these other products and services. Those individuals who are not RRs should not be required to become RRs. The additional burden put on the backs of me and my RR peers is an unfair disadvantage to us RRs. In addition, FINRA is expanding into an area, where FINRA traditionally has not nor should not be. I find the philosophies and the planning ideas and concepts from the NON securities business often diametrically opposed to those of many Broker Dealers which do not even have a basic or clear understanding of Insurance and other NON Securities products. The idea of safety and guaranteed rate of return, life time protection, full protection, and other insurance concepts is often disregarded by many Broker Dealers as reducing the overall return for the client.

Clearly FINRA is overstepping its boundaries and should NOT continue with its plan to regulate the concerns of our client's NON securities business and decisions.

Sincerely,
Douglas M. Brauer, LUTCF

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Douglas M. Brauer, LUTCF
Registered Representative and Financial Advisor
Pacific Advisors, Inc DE
California License # 0B22243
Website address: www.pacificadvisors.com

Office: 916-223-1435 ext. 206
Fax: 916-922-2750 Primary
Fax: 916-221-9905 Direct to Email / Private (limited to 6 pages per fax)
e-mail: douglas_brauer@glic.com

Physical Address:
1900 Point West Way, Suite 222
Sacramento, CA 95815

Coming together is a beginning. Keeping together is progress. Working together is success. -- Henry Ford

Douglas M. Brauer, Registered Representative and Financial Advisor of Park Avenue Securities LLC (PAS), 20 Bicentennial Circle, Suite 100, Sacramento, CA 95826, 1-916-379-0200. Securities products/services and advisory services are offered through PAS, a registered broker/dealer and investment advisor. Financial Representative, Guardian Life Insurance Company of America (Guardian), New York, NY. PAS is an indirect, wholly owned subsidiary of Guardian. Pacific Advisors, Inc. is not an

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