

From: Scott Dean [mailto:SDEAN@arvest.com]

Sent: Tuesday, June 23, 2009 10:12 AM

To: Comments, Public

Subject: FINRA Regulatory notice 09-25--Although you will receive many correspondence to this point I URGE you to listen to those of us on the ground.

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

RE: FINRA Regulatory notice 09-25

As one of the advisors who closely looks out for clients best interest (licensed insurance advisor and registered Investment Advisor) I *strongly urge you to object to expanding FINRA's suitability obligations to recommendations that do not involve securities.*

Here is what concerns me the most:

1. Having been in insurance, brokerage, and banking environment it is painfully clear that neither FINRA nor broker/dealers have the resources or product-specific expertise necessary to oversee non-securities transactions.
2. The application of FINRA rules to state regulated products could result in conflicting and confusing regulatory requirements which will detract from the goal of consumer protection.
3. Finally, further broader-scale changes may be made within a matter of months rendering seemingly 'knee jerk' reactions now by FINRA useless or at least unnecessary in hind sight.

For the reasons stated above, I urge you not to expand FINRA's suitability obligations to include recommendations that do not involve securities. Thank you for considering my views on this issue.

Respectfully,

Scott Dean, Client Advisor
Regional Insurance Specialist
Arvest Asset Management
Arvest Bank Group
4301 W. Memorial Rd
OKC, OK 73134
405.419.3826 Direct Line
405.419.3814 FAX

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