

Dear Sir/Madam:

Insurance Services Office, Inc. ("ISO"), as a significant supplier of insurance products to the financial services industry, is pleased to offer our comments in regard to the adoption of NASD Rule 3020 as FINRA Rule 4360.

By way of introduction to our company, ISO is the leading provider of insurance information to the property and casualty insurance industry. In that capacity, we develop policy forms, endorsements, rate manuals and loss costs (rates) for use by our insurance company customers. We also provide our customers with statistical services for the reporting, aggregating and trending of premium and loss information. These products are provided for most property and casualty lines of business, including the fidelity and crime line of insurance. Specifically, the ISO Financial Institution Securities Brokers And Dealers policy is written for FINRA member firms

With regard to the proposed adoption of FINRA Rule 4360, we generally support the changes being made. However, in Supplementary Material, 01. Alternative Coverages, we note FINRA's proposed designation of its proprietary Securities Dealer Blanket Bond as the benchmark for coverage and refers only to Financial institution Bond Form 14 (published by the Surety And Fidelity Association of America ("SFAA")) as the primary acceptable alternative if companies are unable to qualify for the FINRA form. We believe that our product deserves equal mention as our form also complies with FINRA guidelines and is available to members unable to obtain the Blanket Bond. Proposed Rule 4360, as currently written, creates an uneven playing field in that it promotes the SFAA and its product to the exclusion of other coverage options and restricts competition in the marketplace as the ISO policy form and independent company forms (substantially similar to the ISO policy form) would be precluded from being written on member firms. Therefore, we urge FINRA to permit the use of ISO's Financial Institution Securities Brokers And Dealers policy, the SFAA's Form 14 as well as other similar forms of coverage manuscripted by independent insurers or which are otherwise available in the marketplace.

We appreciate the opportunity to comment on the Proposed Rule and are available to answer any questions you may have regarding our response.

Sincerely,

Howard M. Bernstein, Esq.

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