

I would like to say that shortening the mandatory response time period to 30 calendar days may be detrimental to the filer. People starting a new firm are obviously working on a lot of things at once in terms of trying to get a new firm launched. Some of the required items to satisfy FINRA reviewers necessitate careful thought and consideration, and often the counsel of others, including consultants, attorneys, accountants and other professionals, who have their own busy schedules. I always thought that 60 days was a fair time frame, as it is generally assumed that the filer always has the incentive to move things along as fast as possible, in order to get the business started.

This is especially true as FINRA's list of required items is longer than ever, with more required details as ever for those items. No one wants to intentionally submit incomplete or inaccurate information as part of an initial or continuing membership application, and therefore, I would urge you to keep 60 days as a more fair and equitable response time from filers.

Thank you for your consideration.

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