

Although I am generally in favor of having better qualified and more knowledgeable people working in the securities business, I cannot support a proposed rule that would apparently require numerous back office and operations staff to take a regulatory examination as a condition of their employment.

I continue to support a regulatory examination for those persons that are clearly in positions of authority and decision-making for the BD. An officer title is a clear indicator of that authority. If you are a Vice President in charge of some operational aspect of a broker-dealer, I can support a regulatory examination for that Vice President.

I am not in favor of requiring a regulatory examination for operations and back office staff. Those jobs typically have high turnover rates, often require less knowledge and experience than so-called professional positions in the BD and would impose an unreasonable burden on the BD in terms of costs versus benefits. One extreme is to require a regulatory exam for every person that works for the BD, in the interests of “investor protection”, but that seems to be an unreasonable solution to me.

We currently have an historically high unemployment rate in this country, especially for those without college degrees. To impose this type of rule will only make it harder for those looking for entry-level jobs and jobs that may not require extensive academic education and backgrounds. The proposal will also limit the possible pool of qualified workers for a BD, which doesn't help from the BD perspective.

Many registered reps and other professional staff may have gotten their first taste of our business by starting out in a non-registered job at a BD. Let's not make things harder than they already are...

Thank you for the opportunity to comment.

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