In our opinion this Rule would be costly for a broker dealer to implement. The tracking of each dollar received by category and maintaining a three month rolling average would be a large burned.

This rule would hurt smaller firms because we have less revenue sources than the large broker dealers.

The filing of FUCUS reports have not help in stopping firms from having financial issue. Bear Stearns and Lehman Brothers are an example.

Sincerely,

William H. McCance, President



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