

Dear Mr. Pullano:

I believe I understand the impetus of expanding BrokerCheck; but as with other initiatives with CRD expansion in the past; the lack of an appellate or record corrections process worries me. Having served on a District Committee and several national FINRA or NASD committees, and as an industry arbitrator, I have heard more than a few stories of misleading or even inaccurate entries on individual CRD records. In the past discussions were held on establishing a review board or a standing committee to offer firms and representatives a process to correct or even expunge their records of misleading information. Such a panel could be comprised of FINRA and/or NASAA representatives or employees, perhaps some industry and public representation.

The lack of such a review process before allowing commercial access to the data on BrokerCheck would be unfair, in my opinion.

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