Thank you for the opportunity to comment on the proposed expansion to BrokerCheck.

I think expanding BrokerCheck to include professional designations would be fine, but with the caveat that there would need to be some sort of requirement that the data be maintained on a current basis. It is quite possible for a registered representative to obtain a designation, only later to let it expire or terminate. If there is no corresponding requirement to notify and update the CRD system of the terminated status, the added information will only confuse and potentially mislead investors (even if inadvertent or just an oversight).

I feel that releasing historical exam scores would have zero relevance in correlation to the current expertise or knowledge of the individual. I think this type of data would enhance the ability of legal counsel to use it in an adverse way, and could even potentially expose FINRA to liability if there should be a challenge against them for allowing someone to register that obtained marginal passing grades, and that individual later commits fraud or violates a securities law. I am unaware of any factual evidence that supports that a high exam score equates to a high level of current knowledge about the financial industry.

Finally, I have encountered many individuals over the last 25 years that have had misleading or inaccurate information on their CRD records, which is nearly impossible to get corrected. I don't believe any additional expansion of information should be considered until there is a platform or formalized process available to the industry, that allows someone to correct this information.

Sincerely,

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