

April 24, 2012

Marcia E. Asquith
Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington, DC 20006-1506

Re: **Regulatory Notice 12-10, Request for Comment on Ways to Facilitate and Increase Investor Use of BrokerCheck Information**

Dear Ms. Asquith,

Thank you for the opportunity to comment on Regulatory Notice 12-10 (“The Notice”), which seeks comments on ways to facilitate and increase investor use of BrokerCheck.

First and foremost, scores on industry qualification examinations should not be included in BrokerCheck nor disclosed to the public. Very few industries if any disclose actual scores on examinations. Scores can in no way accurately reflect the experience gained by a registered representative who has worked years in the brokerage industry. The investor simply knowing that their representative or potential representative is qualified by virtue of passing qualification examinations should continue to suffice. Making examination scores available would have many serious unintended consequences, and in no fashion serves to better protect or educate the investing public.

Comments relating to a broker’s termination should be included, but only if the termination was for cause. Employment history with FINRA registered firms is already included in BrokerCheck information, making it easy for the investing public to know where, when, and for how long a broker has been employed. To include information on all terminations would be potentially misleading. The word termination itself has a negative connotation. Many representatives choose to leave a firm for a myriad of different reasons, and more often than not the parting is amicable. The investing public is no better served nor protected by knowing why a representative was terminated, unless it was for cause.

The Notice asks if it would be beneficial for investors to include links to other websites maintained by financial industry regulators or organizations that provide investor education within BrokerCheck reports. While investor education is in the best interest of the industry as a whole, additional links are not needed within BrokerCheck itself. FINRA’s website already includes a vast amount of material specifically devoted to investor education. The purpose of

BrokerCheck is to provide information to investors about the persons and firms they are considering working with, and not to further educate investors. FINRA should instead consider putting this additional information from financial industry regulators and organizations under a separate section of their website. If the information were contained in links within BrokerCheck reports themselves it is possible an investor who could benefit from the information and who is not planning on using BrokerCheck would never see the information. By keeping the information separate and on FINRA's main investor site more investors would be exposed to the additional information.

The Notice asks if educational background and/or professional designations should be available in BrokerCheck. Certainly, educational background should not. There are most likely thousands of registered representatives whose level of education does not rise above a high school diploma, but who may have spent many successful decades in the securities industry. Providing educational background could potentially steer investors away from eminently qualified investment professionals who may not possess a commiserate level of education as others in the industry.

Professional designations are a different matter. Designations earned from accredited sources should be included in BrokerCheck. Unlike providing educational background, a professional designation shows that the individual has completed the requirements for such designation in a specified area of expertise. However, should FINRA choose to include professional designations, there should be a specific list of what designations will be included. In the past there have been many so-called designations in the securities industry that could essentially be bought, with no test of knowledge administered. Generally accepted and widely known professional designations should be included in BrokerCheck, as long as the individual's designation is current and up to date.

The Notice asks if FINRA should provide BrokerCheck information to for-profit companies for commercial use. The answer is a resounding no. There are many commercial entities already mining the various state securities boards and commissions for information on registered representatives, and publishing it freely. This information is often subject to editing and/or comment by anyone who desires to do so. As a result, much of the information may be deemed unreliable, although it may have been accurate when initially obtained. The thought of FINRA being in the publishing business to the greater extent than it already is, and especially with such sensitive information, is filled with fraught. Once the information is given, it may prove difficult for FINRA to impose limitations.

Thank you for the opportunity to comment on these important measures. BrokerCheck is a valuable tool for potential investors. FINRA must carefully weigh what additional information (if any) is disclosed and the manner in which it is disclosed. BrokerCheck should provide a starting point to assist the investing public in selecting which representative or firm to work with. The information provided through BrokerCheck should always be fair and balanced. Disclosing

test scores, educational background, or all termination information may serve to create an unfair bias against some in the industry.

Respectfully,

Russell Travis