

This rule seems to be unnecessary. There are several existing rules designed to avoid conflicts of interest and churning of accounts already and employing this rule wouldn't significantly deter this. It seems more motivated to discourage firms from offering these packages or limit their size versus safeguarding clients. Employing this rule will make recruitment efforts at smaller firms much more challenging and difficult and will require CCOs and Principals to develop an additional layer of policies/procedures and supervision. This additional layer may, and most likely will, impact their abilities to perform their current due diligence and supervisory duties that are far more important in safeguarding client investment accounts and potential fraudulent/illegal activities such as Money Laundering. I don't see how disclosing the amount of compensation a registered representative makes provides any safeguards of client assets and ultimately said disclosure can create conflicts between client and RR. No other profession, Medical, Legal, or other financial service provider requires that the individual providing their service disclose their individual compensation as it can also be viewed as an invasion of privacy as much as transparency.