Ms. Jennifer Piorko Mitchell
Office of the Corporate Secretary FINRA
1735 K Street, NW Washington, DC 20006-1506

Re: FINRA Regulatory Notice 18-22

Dear Ms. Mitchell:

I write in support of the proposed amendment to the Discovery Guide to require routine disclosure of liability insurance coverage by broker/dealers who are thinly capitalized or not self-insured. I have represented investors in FINRA arbitration for more than 35 years .

Brokerage firms more than other businesses are cognizant of business risks, including errors and omissions and other 'wrongful conduct' by their representatives. As prudent business-persons, they buy coverage to insure against these forseeable business risks.

It is inefficient to hide coverage limits, or the lack of coverage to parties and their attorneys, who may miscalculate the claims asserted in Arbitration and other potential litigation. That is why, in most jurisdictions, insurance coverage is discoverable. Experienced practitioners are aware that many small brokerage firms also offer insurance products in connection with the financial services they provide. Some insurance product providers require that their appointed representatives have insurance coverage for the financial planning they provide that includes insurance product sales. Other dually registered investment advisors have financial planning coverage that covers both investment products and insurance products.

Arbitration requires that parties cooperate in discovery. Full disclosure that requires production of the policies which would include any retention amounts, and exclusions from coverage can only serve to assist parties that institute and defend claims with knowledge that coverage [which may or may not include the costs of defense] will be there if an arbitration award is granted by a Panel.

Please let me know if there are any questions.

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"representing investors for more than 35 years"