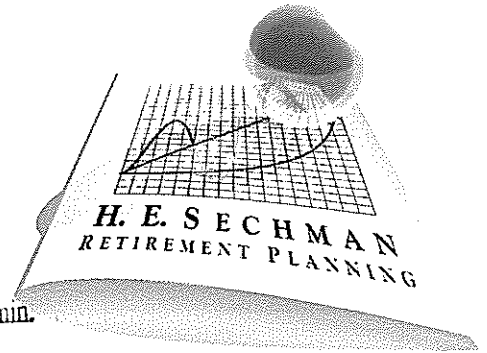


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June 23, 2009

Office of the Corporate Secretary-Admin.

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

JUN 26 2009

FINRA
Notice to Members

255 Park Avenue, Suite 704
Worcester, Massachusetts 01609
Telephone 508-753-9001
Fax 508-890-8539
www.hesrp.com

Dear Ms. Asquith,

The subject of FINRA wanting to oversee the suitability of non-securities has caught my attention.

For the past 20 years, I have been a licensed insurance professional and a registered representative for 18 of those years. I am writing to you because I strongly object to expanding FINRA's suitability obligations to recommendations that do not involve securities. I believe FINRA has more than it can handle right now.

At the outset, let me clearly state that I firmly believe that people who promote unsuitable sales and engage in misleading and questionable sales practices should be pursued, aggressively prosecuted, and subject to meaningful sanctions where necessary. No better example exists than that of Mr. Bernard Maddoff.

However, FINRA does not have jurisdiction over products and services which are not securities, and neither FINRA nor broker/dealers have the resources or product-specific expertise necessary to oversee non-securities transactions. FINRA's authority should not be expanded to include non-securities products and services. Another reason why the expansion of FINRA's suitability obligations is unwise is that insurance and other non-securities products are already subject to comprehensive regulation at the state level.

Finally, policymakers on Capitol Hill, in the Administration, the SEC, and FINRA, as well as private sector stakeholders are currently debating issues concerning the standard of care which broker/dealers and investment advisors owe to their clients and considering whether such standards should be expanded or changed going forward. It would be inappropriate for FINRA to expand or revise current suitability requirements while this debate is underway, since further broader-scale changes may be made within a matter of months.



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Fee-based Services offered through Sigma Planning Corporation, a Registered Investment Advisor

For the reasons stated above, I urge you not to expand FINRA's suitability obligations to include recommendations that do not involve securities.

Thank you for considering my views on this issue.

Sincerely,

A handwritten signature in cursive script that reads "Harry E. Sechman". The signature is written in black ink and is positioned above the typed name.

Harry E. Sechman, CLU, ChFC, CRPC, BCM, CFS, LUTCF
President