



March 8, 2010

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

**Re: Proposed Consolidated FINRA Rules Governing Securities Loans and Borrowings, Permissible Use of Customers' Securities and Callable Securities – Regulatory Notice 10-03.**

Dear Ms. Asquith:

Accounting and Compliance International (ACI) strongly supports the efforts to streamline and add clarity to the new consolidated rulebook. The proposed consolidation of the rules governing securities loans and borrowing seems to be an example of a simplified rule that eliminates duplicative and/or outdated provisions. Furthermore, the elimination of specific allocation requirements will allow member firms to establish procedures more tailored to their unique operation.

ACI would like to encourage FINRA staff to take the same approach towards simplification as the rulebook consolidation continues.

ACI is a premier provider of cost-effective financial industry consulting services. Based in the heart of Wall Street, ACI constantly strives to strike a balance between customer protection and market efficiency and is a proponent of rule proposals that streamline, simplify and clarify the compliance obligations of member firms and applicants.

Please feel free to contact me at (212) 668-8700 or at [drome@acisecure.com](mailto:drome@acisecure.com) if you have any questions or would like to further discuss these comments. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel C. Rome", enclosed within a large, loopy blue oval scribble.

Daniel C. Rome  
Executive Consultant