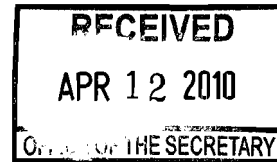


Baker Perkins Inc.  
3223 Kraft Avenue  
Grand Rapids, MI 49512



March 24, 2010

Ms. Elizabeth M. Murphy  
Secretary  
Securities and Exchange Commission  
File No. S7-03-10  
100 F Street  
Washington, DC 20549-1090

Dear Ms. Murphy:

The purpose of this letter is to address the proposed SEC rule 15c3-5 and the implications it will have on the financial markets. This rule will strengthen the financial markets by holding brokers and dealers with direct market access accountable for establishing risk management tools, which will systematically limit the exposure of brokers and dealers to risk in the overall financial market.

This rule will help protect individual investors by preventing the entry of orders that exceed pre-set credit or capital thresholds, appear to be erroneous or fail to meet compliance with all regulatory requirements. Such protection is a benefit to investors and does not place a large burden on brokers or dealers with direct access. It will help to maintain stability in capital markets by eliminating unnecessary risk by individual investors. Such investors may not be aware of the risk but brokers and dealers clearly should be. Therefore, it should be the responsibility of the brokers and dealers to address such risk. The overall burden of this rule will not in any way limit an individual investor's opportunity to participate in capital markets but will shift unnecessary risk of the individual investor to where the risk should be.

I would like to express my appreciation for your time and the opportunity to comment on the proposed SEC rule 15c3-5. I thank you for the SEC's commitment to protecting investors while maintaining and providing opportunities in capital markets.

Sincerely,

Ryan Thatcher  
Corporate Accountant  
Baker Perkins, Inc.