



**WALL STREET
FINANCIAL GROUP**
Member FINRA, SIPC

May 16, 2008

Nancy M. Morris
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: File Number S7-10-00

Dear Ms. Morris,

Thank you for the opportunity to comment on the proposed changes to Part 2 of Form ADV. Wall Street Financial Group, Inc. is an independent broker dealer and registered investment adviser with branch offices in several states. We commend the Commission for its ongoing efforts to improve Form ADV.

We believe that while the proposed amendment intends to offer improved disclosure to clients, creating a longer, more detailed narrative for clients has proven, in recent studies, to actually be less effective. Clients tend to be intimidated by the volume of such documents, and respond better to brief, concise disclosure documents. This is evidenced in the recent RAND Study and in the SEC's own Summary Prospectus proposal.

There are also several items in the proposed amendment that warrant clarification.

- ? The proposed amendment would require those supervised persons engaging in non-investment related business activities that provide a substantial source of their income or that involve a substantial amount of their time to disclose this information in their Supplement. It is unclear as to the definition of "substantial income" or "substantial time."
- ? The proposed amendment would also require specific disclosures if an adviser engages in frequent trading. Again, the term "frequent trading" is not defined.

The Commission has stated that they "prefer instead to leave some flexibility to advisers." We appreciate this consideration; however, these subjective terms lend themselves to open interpretation, and ultimately provide for non-uniform implementation and supervision of the regulation. We ask that you either define these terms to provide clear guidelines for advisers, or consider removing these requirements from the amendment.

We also agree completely that clients should have access to the information contained in Part 2 of Form ADV.



WALL STREET FINANCIAL GROUP

Member FINRA, SIPC

However, requiring an annual mailing of Part 2 in its entirety would, again, be ineffective for the client and unnecessarily cumbersome for the adviser. According to the previously discussed RAND study and the SEC's own Summary Prospectus proposal, these annual mailings will likely go unread by advisory clients. As such, the hours spent mailing the brochure annually (253.25 hours, as indicated by the Commission) will provide no practical benefit to the investor. We suggest, instead, that advisers be required to provide their clients with notice of the update, and information on how to obtain Part 2 electronically or via hard copy. In the event that the Commission will not reconsider the annual mailing requirement, we recommend at least reducing the mailing requirement to include only the summary of material changes, along with information on how to obtain the entire Part 2 should the clients choose.

Lastly, the Commission asked for comment regarding the required use of XBRL to file Brochure information. Mandatory use of this programming language could be costly to smaller firms, considering it is not currently required, and therefore, not commonly used.

Thank you for the opportunity to comment on this proposed amendment.

Sincerely,

Nancy Kay
Chief Compliance Officer