Dear Sir/Madam,

Our firm is in agreement that it is long past time for an update to these rules. We also felt some consideration should be given to the following:

- 1. The public's awareness of the risks, opportunities and methods of the financial markets has increased significantly since 1982 (via the 1987 crash, the Internet boom and bust, and the proliferation of self-directed retirement plans).
- 2. The availability of information, analysis, and opinion about the financial markets has increased significantly since 1982 (via TV: CNBC, Bloomberg TV, and via the Internet).
- 3. The cost of professional financial advice has dropped significantly since 1982
- 4. Impairing the access of people in lesser wealth categories to sophisticated methods of diversification and risk management may increase the financial risks to which they are exposed.

Thank you.

Janice Greene Freestone Capital Management Chief Compliance Officer

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