

VIA ELECTRONIC DELIVERY

October 5, 2007

Nancy M. Morris
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090

Re: File No. SR-FINRA-2007-05; "Notice of Filing of Proposed Rule Change to Amend NASD Rule 11870 and NYSE Rule 412 and its Interpretation to Make the Time Frames for Validating or Taking Exception Consistent with the Time Frames in the ACATS Service"

Dear Ms. Morris:

Edward D. Jones & Co., LP ("Edward Jones", or "the Firm") submits this letter in support of the above-referenced proposal submitted by the Financial Industry Regulatory Authority ("the Proposal"). Stated briefly, the Proposal would serve to shorten the account transfer process by aligning the Automated Customer Account Transfer Service time frames with the National Securities Clearing Corporation transfer cycle.¹

As background, Edward Jones is a full-service, self-clearing firm that does business in all 50 States. The Firm services over 5 million customer accounts and is a frequent user of ACATS.

Edward Jones believes that the proposed changes will significantly improve the experience of the investor when transferring assets. The Firm agrees with the position as expressed in the Comment Letter dated October 3, 2007 recently submitted by the Customer Account Transfer Division of SIFMA. It is without question, in the Firm's opinion, that a reduction in the number of days to review an account transfer (from 3 to 1) will improve market efficiency and customer satisfaction. Further, the reduction of the ACATS FundServ processing time will allow the re-registration process to be completed faster and more predictably.

Any questions or requests for elaboration should be directed to the undersigned, who can be reached at (480) 337 – 2631.

Sincerely,

Kristie Thompson
Group Leader
Customer Account Transfer

¹ The file number for NSCC's companion rule filing is SR-NSCC-2007-13.