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April 17, 2009

VIA E-MAIL

Florence E. Harmon
Deputy Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

Re: **File Number SR-FINRA-2009-008**
FINRA Proposed Rule Change to
Revise Forms U4 and U5

Dear Ms. Harmon:

This letter is being submitted on behalf of the Association for Advanced Life Underwriting (“AALU”). AALU is a nationwide organization of life insurance agents, many of whom are engaged in complex areas of life insurance such as business continuation planning, estate planning, charitable planning, retirement planning, deferred compensation and employee benefit planning. AALU represents approximately 2,000 life insurance agents and financial advisors nationwide.

AALU is concerned about certain rule changes proposed by the Financial Industry Regulatory Authority, Inc. (“FINRA”) to revise Forms U4 and U5. Specifically, we oppose and urge the Securities and Exchange Commission (the “Commission”) not to incorporate recommended changes to Forms U4 and U5, which would call for reporting of allegations of sales practices violations made against a registered person that are made in the body of an arbitration claim or lawsuit, even if that person is not named as a party.

Such a requirement could unfairly taint the reputations of registered persons who have not engaged in any inappropriate practice without affording such persons with the opportunity to show they acted appropriately and restore their good standing. To avoid this unfair result and make the reporting more administrable, we believe that the trigger for required reporting on Forms U4 and U5 should continue to be situations where registered persons who are accused of sales practice violations are named as a party to an arbitration claim or lawsuit.

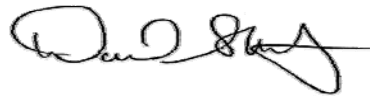
AALU supports FINRA's proposed changes that would allow for the date of termination and the reason for such termination to be amended on Form U5. The current practice of permitting such a change, only if there is an arbitration award or court order directing such a change, is too burdensome and does not take into account the ongoing impact that mere clerical errors, among other things, can have on a registered person's CRD record.

AALU appreciates the opportunity to offer the comments above. AALU respectfully requests that the Commission consider these comments and incorporate the changes we recommend. If you have any questions or if additional information would be helpful, please contact Tom Korb, AALU Vice President of Policy & Public Affairs, at 703-641-8120.

Respectfully Submitted,



Michael P. Corry, CLU
AALU President



David J. Stertzer, FLMI
AALU CEO