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**Edward Jones**



April 17, 2009

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

Re: Release No. 34-59-616; File No SR-FINRA-2009-008  
Proposed Changes to Forms U-4 and U-5

Dear Ms. Murphy:

Edward Jones appreciates the opportunity to submit comments on the referenced proposed rule amendments by the Financial Industry Regulatory Authority ("FINRA"). The Firm's comments are in support of the proposed measures. Further, we do have recommendations regarding its proposed implementation.

Edward Jones is a full-service broker-dealer serving more than seven million client accounts through approximately 11,000 financial advisors throughout the United States. Edward Jones' business model is based on providing personalized service and long-term investment opportunities to individual investors.

Edward Jones supports the rule proposal and the subsequent changes to Forms U-4 and U-5 and recognizes the benefit to the financial services industry and individual investors that will result from the additional disclosure questions designed to identify registrants (or those seeking registration) subject to statutory disqualification. The firm's comments below relate to the method of implementation of these changes.

FINRA is proposing that the new disclosure questions be completed by the registrant at the time an amendment to the U-4 is made or within 120 days, whichever occurs first. Given the different types of U-4 amendments (i.e. address change, additional state registrations) and the number of Edward Jones registered representatives, we respectfully submit that requiring the new disclosure questions be answered by the registrant at the time of the amendment will place a significant burden on the firm.

Edward Jones currently submits over 2,000 Form U-4 amendments each month. The firm believes that by requiring answers to the six new disclosure questions the first time an amendment is filed for a registrant after the effective date, the proposal will effectively eliminate the allowable 120 days for completion of these new disclosure questions and create undue delays for other time-sensitive Form U-4 amendments, such as additional state registration requests.

In order to address these significant practical challenges, Edward Jones requests that FINRA modify the rule proposal to extend the implementation date to 180 days from the effective date for all filings, including those involving amendments. Additionally, we request that FINRA populate the new questions with a

"no" answer during the implementation period or alternatively suppress the CRD-system completeness check to enable firms to continue to send other amendments during the implementation time period.

Finally, we request that FINRA waive the signature requirement for these additional disclosure questions and provide a mechanism that would enable firms to electronically batch file the amendments without need for the representative's manual signature solely with regard to the initial amendments. We believe these modifications would significantly alleviate the practical operational and administrative challenges associated with implementation and support the compliance objectives of this rule proposal.

Edward Jones appreciates the opportunity to comment on this rule proposal. If you have any questions regarding the firm's comments and recommendations please contact me at 314-515-9711.

Sincerely,



Jesse Hill  
Director of Regulatory Relations