

Please do not raise our fees at this time. Our industry is under increasing pressure to reduce costs. Over the years our compliance requirements have more than tripled while at the same time our revenue has declined in relation to the market crash 40 % or more. Just like everyone else, we are trying to make due with these declines although we have increasing demands to provide our clients with more services and technological solutions. These additional services already cost more to provide and by doubling our regulatory fees would have a severe affect on our ability to service our clients adequately especially since we must pay fees not only to FINRA, the states we do business, but for insurance licenses, E & O insurance and other incidental charges.

- FINRA's failure to properly prepare for the inevitable market downturn is the root cause of their operating cash flow concerns.
- It is, therefore, unfair to burden broker-dealers, financial advisors and their clients, all of whom have all suffered greatly during the recent market downturn, with these additional fee assessments.
- More specifically, the doubling of the PA is simply unjustified by any reasonable calculation of inflation over the five-year period since the last increase in this assessment.
- Finally, the new method of calculation for the GIA will only increase the disproportionate burden borne by independent broker-dealers, independent financial advisors, and their clients because of aspects of our business model that are unique in the securities industry.

Please find other solutions to fund your budget or make due with the funds that you have available. Perhaps you can raise your fines for those who do not comply with the rules and regulations rather than penalizing us you do our best to comply with your ever increasing regulations.

Best regards,  
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