



Robert B. Lyons, CLU, ChFC  
Investment Adviser Representative

SR-FINRA-2009-057

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September 25, 2009

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

To whom it may concern,

It has come to my attention that FINRA has filed with the Securities and Exchange Commission a proposal to double the PA and alter the method of calculation for the GIA. According to FINRA the proposed amendment would achieve a more consistent and predictable funding stream to carry out its regulatory mandate. However, it is unfair to burden broker-dealers, financial advisors and our clients, whom have all suffered during the recent market downturn, with these additional fee assessments due to FINRA's failure to properly prepare for the inevitable market downturn.

Also, the doubling of the PA is simply not justified by any reasonable calculation of inflation over the five year period since the last increase in this assessment. Moreover, the new method of calculation for the GIA will only increase the already disproportionate burden borne by independent broker-dealers, independent financial advisors and their clients due to the aspects of our business model that are unique in the securities industry. Therefore I urge the Securities and Exchange Commission to deny the proposed amendment

Respectfully,

A handwritten signature in black ink, appearing to read "Robert B. Lyons", written over a faint, larger version of the same signature.

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