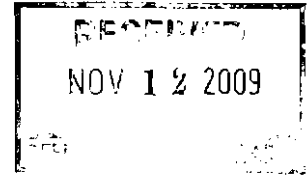


Elizabeth Murphy  
Secretary  
Securities and Exchange Commission  
100 F. Street  
Washington, DC 20549-1090



October 29, 2009

Re: SR-FINRA-2009-060

Ms. Murphy,

I appreciate the opportunity to comment on proposed changes to FINRA rule 8210. I have a few humble suggestions.

1. In requesting electronic documents FINRA and all SROs should be subject to something like the Federal Rules of Civil Procedure. Congress and Courts have recognized the burdens that can be placed upon parties from poorly thought out document requests and the need to balance the want to know with the burden of producing. A unilateral approach no longer works.
2. FINRA should be required to be more disciplined when it denies witnesses the opportunity to purchase a transcript of on-the-record testimony. A certain level of approval should be required and a written record of why such request was denied should be available for inspection by OCIE and/or FINRA's Ombudsman. Finally, FINRA should be required to keep statistics on the practice of denying access to transcripts. Simply allowing the witness or counsel to inspect a copy at a FINRA office is burdensome and denies witness due process unless there is some overriding reason.

Respectfully

BTUD