FINRA District Committees and District Nominating Committees;

I am writing as a 3rd year District 8 Committee member. Today, membership is as follows:

Size	#Firms	%Firms	#RRs	%RRs
1 to 5	1,550	37.09%	4,635	6.05%
6 to 10	875	20.94%	6,695	8.74%
11 to 20	718	17.18%	10,479	13.68%
21 to 50	621	14.86%	19,753	25.79%
51 to 100	306	7.32%	21,586	28.19%
101 to 150	109	2.61%	13,436	17.54%
Small (1-150 RR above)	4,179	91.48%	76,584	11.95%
Medium (151-499 RR)	217	4.75%	60,886	9.50%
Large (500+ RR)	172	3.77%	503,137	78.54%
Totals	4,568	100.00%	640,607	100.00%

FINRA membership is made up of 91.48% of small firms which have about 11.95% of the total reps and 8.52% of large firms which makes up 88.04% of total reps. while the large firms do employee more reps, reps are not members. As a result, the current proposal as stated is essentially saying that despite the fact that 91.48% of FINRA members come from small firms, due to the fact that the they employee a larger number of reps (of whom do not count as members) that the 8.52% should have more say than the small firms who make up almost all of FINRA membership. What FINRA is proposing is simply the practice of gerrymandering. In comparing this proposal to a different situation, California and New York despite making up only 4% of the total states contains a large majority of the U.S. population. Therefore, because those two states have more of a population they should have an overwhelming ability to select the next President and the other 48 states with smaller populations are dwarfed by their vote. As for the District Nominating Committee going away and being replaced by a direct nomination contingent on size, the voting becomes more of a popularity contest as opposed to being selected by your peers based on proven track records and industry background.

Sincerely,

Ed Horwitz
Horwitz and Associates, Inc.
2610 Lake Cook Road
Suite 190
Riverwoods, IL 60015
Phone 224-632-4600
Fax 224-632-4591
Ed@Horwitzco.com
www.horwitzco.com