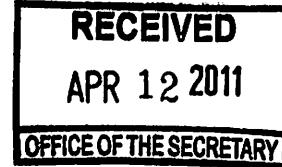


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Edward Jones

April 8, 2011

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



Re: File No. SR-FINRA-2011-013; Proposed Operations Professionals Registration Requirements

Dear Ms. Murphy:

Edward Jones appreciates the opportunity to provide comments on the proposed FINRA Rules 1230(b)(6) and 1250 regarding the establishment of an Operations Professionals registration category and related continuing education requirements. We commend FINRA's efforts to ensure that Operations Professionals understand key regulatory requirements and risk controls related to their responsibilities and the importance of escalating potential red flags to the appropriate area.

Edward Jones is one of the largest financial services firms in the United States, serving the needs of over seven million U.S. investors through personalized service provided by over 12,000 financial advisors. We focus on serving the needs of the serious, long-term individual investor by promoting an investment philosophy that emphasizes quality and diversification.

Edward Jones generally supports FINRA's proposed Operations Professionals rules; however, we have outlined two concerns below.

1. No Grace Period for Clearing Member Firms

We believe it is critical that FINRA extend the 120 day grace period afforded to non-clearing member firms to all member firms, provided individuals in these covered functions are responsible to a person who holds the Operations Professionals registration or other eligible registration as specified in the filing. While we appreciate FINRA's recognition of the challenges presented to non-clearing members if no grace period is permitted, we believe similar disruptions to firm operations and client service will occur if FINRA does not extend this grace period to clearing members. If firm's are unable to identify candidates with the appropriate skill set and necessary registration qualifications they will be required to create interim roles where individuals will study for the exam, resulting in higher regulatory costs, operational delays and reduced levels of service for investors.

While some have likened this registration to the Series 7, where individuals are not allowed to engage in certain activities prior to completing the exam, we believe there are significant distinctions between the functions covered. For example, in operations numerous checks and balances are built into the workflow through separation of duties and other effective controls to limit risk and the possibility of undetected errors. Further, many of the activities described in the covered functions would involve the active input and involvement of others already qualified as Operations Professionals or a comparable examination in addition to rigorous oversight from appropriate Compliance personnel.

2. Application to Technology-related Functions

We are concerned about guidance in FINRA's rule filing regarding the application of these rules to individuals in technology-related roles. Based on our review of the rules, it does not appear that FINRA intends to cover individuals involved in project planning or code development, but rather the individuals responsible for defining and approving the business requirements for sales and trading, information security and other systems related to the covered functions. We respectfully seek clarification that these rules apply only to those who sign off on the requirements and perform the testing to validate the systems rather than those who build and implement the systems.

We believe a broader application of the rule would create significant challenges to the reallocation of technology resources as projects emerge across the firm in a range of functions that may or may not be covered by these rules and could lead to challenges in recruiting technology professionals to work in the securities industry. If FINRA intends to cover individuals beyond those responsible for defining and approving the business requirements for the covered functions, we believe further economic analysis should be conducted on the impact to the securities industry.

Edward Jones appreciates the opportunity to provide comment on these rules to enhance compliance knowledge and awareness among Operations Professionals. We support the spirit of the proposal and would be pleased to engage in further dialogue. If you have any questions regarding the comments in this letter please contact me at 314-515-9711.

Sincerely,



Jesse D. Hill

Director of Regulatory Relations