



10401 North Meridian Street
Suite 202
Indianapolis, IN 46290

317.663.4180 *main*
317.815.0871 *fax*
866.353.8422 *toll free*

reisa.org

February 11, 2014

U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090
Attn: Elizabeth M. Murphy

Re: SEC SR 2014-006 (the "Release")

Dear Ms. Murphy:

The Real Estate and Investments Securities Association (REISA) submits this letter in anticipation of release in the Federal Register of SEC SR 2014-006, which was recently posted on FINRA's website. We understand the proposed rule change seeks to amend the provisions addressing per share estimated valuations for unlisted DPPs and REITs.

Although the Release has not been posted in the Federal Register, REISA respectfully submits this letter in order to seek an extension of the proposed limited comment period of 30 days to a minimum of 90 days.

Due to the complexity of the issues in the release, REISA does not believe that a 30 day comment period provides sufficient time to respond in a complete and comprehensive manner. There are several components within the proposed rule which require careful and thoughtful analysis by REISA members and other industry leaders, which will take a period longer than 30 days to review and compile comments.

In summary, while REISA looks forward to submitting comments on the proposed changes, we respectfully request that the comment period be extended to a minimum of 90 days.

Respectfully submitted,

Mark Kosanke
REISA President