



HILLIARD LYONS

500 West Jefferson Street | Louisville, KY 40202
(502) 588-8400 | (800) 444-1854



December 3, 2007

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

Re: Comments on File Number SR-NASD_2005-100
Proposed FINRA Rule 2231

Dear Ms. Morris:

This letter is in response to FINRA's request for comments on the proposed rule change that would require members to provide customers in TRACE-Eligible debt securities with additional, transaction-specific disclosures and to notify customers of the availability of a disclosure document.

While in principle we support many of the items that are suggested in this proposal we think it is important to point out some of our concerns with a few specific items.

As part of the proposed rule change FINRA has requested that all firms be required to disclose to a client the debt security's CUSIP number and the TRACE symbol of the debt security if one has been designated. The CUSIP number of a security is the industry standard when it comes to identifying a fixed income security and it is already included on all confirmations, not to mention that most, if not all, security firm's data bases have the CUSIP number in them. To demonstrate this even further when a client goes into the bondinfo.com or investinginbonds.com website, both of which are sponsored by FINRA, they are asked to identify the debt security by either CUSIP or name. The TRACE symbol does not give the client any additional information and the change will be expensive for all firms to implement and will require a great deal of time to accomplish.

FINRA has also requested that all confirmations disclose the lowest credit rating(s) a debt security has received at the time of the transaction and the date of such rating(s). While the credit rating(s) is currently on all confirmations the date is not and we are not sure what value, if any, it adds to the client. This again will be very expensive and time consuming without providing a clear benefit to the end user.

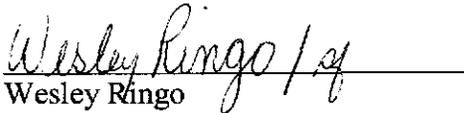
Finally, it is our concern that if the proposed rule is implemented that all confirmations will contain so much useless and unread information that the important disclosures will be lost. We don't think it is the intent of FINRA to require that all confirmations be multiple pages long but we don't see how that can be avoided if the industry is required to put all the information requested on each confirm.

We appreciate the opportunity to provide our input and comments on these proposals.

Sincerely,



Donald E. Merrifield
Senior Vice President
Director of Taxable Fixed Income



Wesley Ringo
Senior Vice President
Chief Compliance Officer