

Thank you very much for the opportunity to comment on the above Notice to Members regarding the proposed revisions for Branch Office Registration.

It appears that the form, as it is currently proposed, is unnecessary lengthy and it would be substantially more time consuming for firms to file the new form, compared to the old form. Much of the requested information is already available on the CRD, either in the Form BD filing or in the form U-4 for each individual registered representative.

Specifically:

Section 1, "General Information" asks again for Applicant CRD and Applicant address. This information should be apparent since the applicant has already entered the system under its own CRD number and thus this information should not again have to be provided.

Section 1 also asks for branch telephone number and fax number. Since the applicant has full supervisory responsibility for the branch and and therefore should be informed of , as well as supervise all regulatory inquiries regarding the branch, it appears that providing the applicant's phone number and fax number should be sufficient. The applicant can inform the SRO of specific contact information relating to the branch upon SRO request.

Section 2 asks whether the supervisor/person-in-charge in charge is currently registered with the applicant. The rules require that the supervisor in charge be registered with the applicant, therefore this question seems unnecessary. The item then continues to request, besides the name and CRD number for the supervisor/person-in-charge, for disclosure information. Why does the question ask for information that has already been provided on the Form U-4. This appears redundant.

Section 3 inquires whether other financial industry activities, business or services are conducted by any associated person at the branch. Each form U-4 that is filed for associated persons already discloses this information, it also discloses to which branch office this associated person is attached, so requesting this information again appears duplicative.

Section 3 also requires information on whether this other activity is conducted under another name than that of applicant. Since other business activities are not regulated by the SRO's and all outside business activities for individual associated persons has been disclosed on the form U-4, this information appears to be irrelevant for the purpose of registration of one of the applicant's branches as long as the Applicant is aware of outside business activities and has given written permission for an associated person to engage in such activities.

The second question in Section 4 is not clear. What kind of contract does the question refer to?

The fifth question on Section 4 is not clear. Expenses for an Applicant are discussed in the Form BD or the registration filing for an RIA. This question appears to have no relationship to the registration of a branch office.

Section 5 requests a listing of all registered personnel at the branch. This information has already been provided on the Form U-4 for each individual associated person and thus appears duplicative.

Section 7 deals with branch closing. Registering a branch closing or amendment to a branch registration is currently executed with a simple radio button which is easy, fast and effective. The new registration form makes registering a branch closure or withdrawal unnecessarily complicated and time consuming.

Sincerely,

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