Marcia E. Asquith

Office of the Corporate Secretary FINRA

1735 K Street, NW

Washington, DC 20006-1506

Re: Regulatory Notice 14-09

Dear Ms. Asquith,

My firm is a FINRA member specializing in Reg D offerings and placement agent services to large US-based institutional investors. I am also a member of the Third Party Marketer's Association (3PM). I have had an opportunity to review 3PM's comprehensive comments regarding the rule set proposed by Regulatory Notice 14-09 for Limited Corporate Finance Brokers (LCBD). I urge FINRA's Board to carefully consider 3PM's thoughtful and informed commentary, which has earned my strong support.

Steven Rubenstein

Arrow Investments, Inc.