

Marcia E. Asquith
Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington, DC 20006-1506

Re: proposed FINRA Rules 12100(z), 12806, 13100(cc), 13806 and 13807 and the proposed forms

Dear Ms Asquith,

The 180-day notice requirement in proposed Rule 13807(c) for the unnamed person to notify FINRA of the intent to file for expungement relief after FINRA sends its notice of an alleged sales practice violation would **not** provide an unnamed person with sufficient time to determine whether to pursue an In re expungement claim.

FINRA **need not** automatically provide documents, defined as tapes, digital or other recordings or transcripts in proposed Rule 13807(l)(1)(A)(i), to an unnamed person or alternatively require the unnamed person to subpoena FINRA for these documents. Rather the unnamed person should request documents as provided in proposed Rule 13807(l)(1)(A)(i).

On the other hand a named or unnamed person should have a right to file an informal request for FINRA to review the accuracy and integrity of the CRD records. The procedure for these reviews could be simplified by patterning them after the review procedures of the three major credit reporting agencies. If FINRA believes the records to be accurate, then the more complicated proposed rules could be utilized for the express purpose of seeking expungement of these types of allegations.

Sincerely,

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