

MeyerWilson

September 5, 2018

VIA EMAIL ONLY [pubcom@finra.org]

Jennifer Piorko Mitchell
Office of the Corporate Secretary FINRA
1735 K Street, NW
Washington, DC 20006-1506

Re: Regulatory Notice 18-22

Dear Ms. Mitchell:

My name is David Meyer and I am the managing partner of Meyer Wilson, a law firm that represents customers in disputes with brokerage firms in FINRA Arbitration. I have represented customers in FINRA arbitration for about twenty years. I currently serve as an Officer and Director of the Public Investors Arbitration Bar Association.

I write in support of the proposed amendment to the Discovery Guide to require the routine disclosure of liability insurance coverage by broker-dealers that are thinly capitalized or not self-insured. Accurate and timely production regarding the nature and extent of insurance coverage is critical, particularly given the significant number of brokerage firms that are unable to pay FINRA awards issued against them.

This type of disclosure is a routine matter in federal and most state courts. In response to the inquiry as to what documents would satisfy the proposed rule, I believe it would be a mistake to require anything less than a complete copy of the policy itself, including any amendments and riders.

The time to require disclosure of insurance information from non-highly capitalized and non self-insured member firms is now. The proposed rule should be adopted. Thank you for your consideration.

Sincerely,



David P. Meyer