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

Re: FINRA Request for Comment on Proposed Amendments to NASD Rule 2340 to Address Values of Unlisted Direct Participation Programs and Real Estate Investment Trusts in Customer Account Statements

Ms. Asquith,

We support FINRA's proposed amendments to NASD Rule 2340 regarding both valuation of Real Estate Investment Trusts (REITs), and disclosure of deductions of fees and operating expenses in customer account statements; however, FINRA should also more closely examine disclosure of account maintenance fees charged by brokers, and establish a mechanism for investors to receive fair value for their investments after a reasonable period of years.

We currently own two non-publicly traded REITs, and the only mechanism we have of determining their value comes from mini-tender offers or quotes for their sale on the secondary market, i.e., these investments are worth only what someone is willing to pay for them, and certainly not the fixed share prices currently reported on the account statements. We suspect the actual performance of these investments has fallen far short of their publicly traded counterparts, but without an accurate valuation we have no guidance about whether we should sell on the secondary market to cut our losses or hold on to the investments in hopes that they someday become liquid. We support the proposed amendments requiring more current and accurate valuation of these investments.

We were unaware of the magnitude of the up-front loads, fees or commissions deducted from our initial investments in the REITs made several years ago, until only recently when we read news articles about these investments. Allowing companies to deduct fees in such a non-transparent manner is equivalent to allowing them to steal money directly from a checking or savings account. So, we applaud FINRA's efforts to make these up-front expenses more readily apparent.

When we made the initial investments we assumed the investments were held directly by the REITS, similar to a stock dividend reinvestment plan. Our financial advisor did not make it apparent that we would have to pay for an annual account maintenance fee and an "Alternative Investment Custody and Valuation Fee" for each REIT to a brokerage firm. These fees continually erode the value of what appear to be questionable investments.

Last, when we invested in the non-publicly traded REITs, we understood they were relatively illiquid, but anticipated liquidity after a period of years, about five years according to our financial advisor. Shortly after making our initial investments, both REITs discontinued their share repurchase programs and we are unaware of any incentive for management to do anything other than allowing the REITs to run on indefinitely "continuing to collect fees, rather than trying to find the maximum value for the portfolio of properties" to quote a recent

MarketWatch article. FINRA should establish a mechanism for investors to recover fair value for their investments after a reasonable period of years.

Thank you for the opportunity to provide input.

Charlie Howell
Laura Stankosky