

Summary of FINRA Rule Initiatives
(Last Updated 11/29/2010)

FINRA Rule Initiatives/Approved by SEC

| Proposing Notice | Published | Compliance Effective Date | Committee Action | Links to Additional Information |
|--|--|---------------------------|--|--|
| <p><u>SR-FINRA-2010-039</u> – Proposed Rule Change to Adopt FINRA Rules 2090 (Know Your Customer) and 2111 (Suitability) in the Consolidated FINRA Rulebook</p> <p>Proposing to adopt FINRA Rules 2090 and 2111, which replace and are based in large part on NASD Rule 2310 and its related Interpretive Materials, as well as Incorporated NYSE Rule 405(1)</p> | <p>Rule Filing: 7/30/2010</p> <p>RN 09-25: 5/15/2009</p> | <p align="center">TBA</p> | <p>10/6/2010 – Committee met with FINRA Staff re: Proposal’s Potential Overlap with SEC’s Broker-Dealer Fiduciary Duty Study and Related Implementation Concerns</p> <p>9/9/2010 - Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> <p>9/2/2010 – Committee met with SEC Staff to discuss Committee’s concerns</p> <p>3/11/2010 – Committee met with SEC Staff to review Committee’s Comment Letter submitted to FINRA in response to RN 09-25</p> <p>12/15/2009 – Committee met with FINRA Staff to review Committee’s Comment Letter submitted to FINRA in response to RN 09-25</p> <p>6/29/2009 – Comment Letter Submitted to FINRA in Response to RN 09-25</p> | <p>11/17/2010 – Approved SEC Approval</p> <p>Multiple Extensions Filed (2) – <i>See</i> FINRA Legislative History Link</p> <p>FINRA Amended Rule Filing</p> <p>SEC Comment Letters</p> <p>FINRA Legislative History</p> <p>FINRA Response to Comments</p> <p>RN 09-25 Web Page and Comment Letters</p> <p>Related RN 09-25</p> |

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| <p><u>SR-FINRA-2010-034</u> – Proposed Rule Change to Adopt FINRA Rule 4530 (Reporting Requirements) in the Consolidated FINRA Rulebook</p> <p>Proposing to combine aspects of NASD Rule 3070 and Incorporated NYSE Rule 451 and replace them with a single rule, FINRA Rule 4530, in the Consolidated FINRA Rule Book, as well as adopt related Supplementary Material.</p> | <p>Rule Filing: 7/22/2010</p> <p>RN 08-71: 11/28/2008</p> | <p>Approved and Soliciting Further Comments</p> <p>Further Comment Period Expires: 12/3/2010</p> | <p>10/6/2010 – Committee met with FINRA Staff re: Reporting of Internal Conclusions of Violations</p> <p>9/2/2010 – Committee met with SEC Staff to discuss Committee’s concerns</p> <p>8/30/2010 - Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> <p>12/29/2008 – Comment Letter Submitted to FINRA in Response to RN 08-71</p> | <p>11/5/2010 – Approved SEC Approval</p> <p>10/14/2010 – Multiple Extensions Filed (2) – <i>See</i> FINRA Legislative History Link</p> <p>SEC Comment Letters</p> <p>FINRA Legislative History</p> <p>FINRA Amended Rule Filing</p> <p>Related RN 08-71</p> <p>RN 08-71 Web Page and Comment Letters</p> |
| <p><u>SR-FINRA-2009-058</u> – Notice of Filing of Proposed Rule Change to Adopt FINRA Rule 2232 (Customer Confirmations)</p> <p>Proposing to adopt FINRA Rule 2232 and to delete NASD Rule 2230, NASD IM-2110-6 and NYSE Rule 409(f)</p> | <p>Rule Filing: 9/14/2009</p> | <p>TBA</p> | <p>10/13/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>10/21/2010 – Approved SEC Approval</p> <p>9/17/2010 – Multiple Extensions Filed (10) – <i>See</i> FINRA Legislative History Link to the Right</p> <p>SEC Comment Letters</p> <p>FINRA Legislative History</p> <p>FINRA Response to Comments</p> <p>FINRA Amended Rule Filing</p> |

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| <p><u>SR-FINRA-2009-057</u> – Notice of Filing of Proposed Rule Change Relating to Section 1(c) of Schedule A to the FINRA By-Laws to Amend the Personnel Assessment and Gross Income Assessment</p> <p>Proposing to amend Schedule A to the FINRA By-Laws</p> | <p>Rule Filing: 9/2/2009</p> | <p>January 1, 2010</p> | <p>10/2/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>11/20/2009 – Approved SEC Approval FINRA RN Re: Approval</p> <p>SEC Comment Letters</p> <p>FINRA Response to Comments</p> <p>FINRA Legislative History</p> <p>Related RN 09-56</p> |
| <p><u>SR-FINRA-2009-042</u> – Notice of Filing of Proposed Rule Change Relating to Outside Business Activities of Registered Persons</p> <p>Proposing to adopt FINRA Rule 3270 and eliminate NASD Rule 3030 and NYSE Rule 346</p> | <p>Rule Filing: 6/30/2009</p> | <p>For OBAs Commenced Prior to December 15, 2010: June 15, 2011</p> <p>For OBAs Commencing on or after December 15, 2010: December 15, 2010</p> | <p>10/6/2010 – Committee met with FINRA Staff re: Effective Date for Existing OBAs</p> <p>3/11/2010 – Committee met with SEC Staff to review Committee's Comment Letter</p> <p>12/15/2009 – Committee met with FINRA Staff to review Committee's Comment Letter</p> <p>6/30/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>8/23/2010 – Approved SEC Approval</p> <p>Multiple Extensions Filed (8) – <i>See</i> FINRA Legislative History Link</p> <p>SEC Comment Letters</p> <p>FINRA Response to Comments</p> <p>FINRA Legislative History</p> <p>FINRA Amended Rule Filing</p> |

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| <p><u>SR-FINRA-2009-023</u> – Non-Cash Compensation in Connection with the Sale/Distribution of Variable Contracts</p> <p>Proposing to adopt FINRA Rule 2320 and eliminate NASD Rule 2820</p> | <p>Rule Filing: 4/14/2009</p> | <p>October 19, 2009</p> | <p>5/12/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>6/10/2009 – Approved: SEC Approval FINRA RN Re: Approval SEC Comment Letters FINRA Response to Comments FINRA Legislative History</p> |
| <p><u>SR-FINRA-2009-008</u> – Proposed Changes Relating to Forms U4 and U5</p> | <p>Rule Filing: 3/20/2009</p> | <p>November 14, 2009</p> | <p>4/17/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>5/15/2009 – Approved: SEC Approval FINRA RN Re: Approval SEC Comment Letters FINRA Response to Comments FINRA Legislative History Related RN 09-40</p> |

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| <p><u>SR-FINRA-2008-067</u> – Notice of Filing of Amendment No. 2 and Order Granting Accelerated Approval to a Proposed Rule Change, as Modified by Amendments Nos. 1 and 2, to Adopt Rules Governing Financial Responsibility in the Consolidated FINRA Rulebook</p> <p>Proposing to adopt FINRA Rules 4110, 4120, 4130, 4140, 4521, 9557, and 9559; and eliminate or replace parts of NASD Rules 3130, 9557, and 9559; and NYSE Rules 312, 325, 328, and 420.</p> | <p>Rule Filing: 11/4/2009</p> <p>RN 08-23: 5/14/2008</p> | <p>February 10, 2010</p> | <p>3/18/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> <p>6/13/2008 – Comment Letter Submitted to FINRA in Response to RN 08-23</p> | <p>11/4/2009 – Approved: SEC Approval FINRA RN Re: Approval</p> <p>SEC Comment Letters</p> <p>FINRA Response to Comments</p> <p>FINRA Legislative History</p> <p>RN 08-23 Web Page and Comment Letters</p> <p>Related RN 08-23</p> |
| <p><u>SR-FINRA-2008-062</u> – Investor Education and Protection</p> <p>Proposing to adopt FINRA Rule 2267 and eliminate NASD Rule 2280</p> | <p>Rule Filing: 1/2/2009</p> <p>RN 08-26: 5/14/2008</p> | <p>August 17, 2009</p> | <p>6/13/2008 – Comment Letter Submitted to FINRA in Response to RN 08-26</p> | <p>5/29/2009 – Approved: SEC Approval FINRA RN Re: Approval</p> <p>SEC Comment Letters</p> <p>FINRA Response to Comments</p> <p>FINRA Legislative History</p> <p>Related RN 08-26</p> <p>RN 08-26 Web Page and Comment Letters</p> |

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| <p><u>SR-FINRA-2008-019</u> – Sales Practice Standards and Supervisory Requirements for Transactions in Variable Annuities (Rule 2821)</p> | <p>Rule Filing: 6/4/2008</p> | <p>February 8, 2010</p> | <p>12/19/2008 – Additional Comment Letter Submitted re: Effective Date</p> <p>7/1/2008 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>4/15/2009 – Approved: SEC Approval FINRA RN Re: Approval</p> <p>SEC Comment Letters</p> <p>FINRA Response to Comments</p> <p>FINRA Legislative History</p> |
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Summary of FINRA Rule Initiatives
(Last Updated 11/29/2010)

FINRA Rule Initiatives/Pending at SEC

| Proposing Release | Published | Status | Comment Letter History | Links to Additional Information |
|--|---|------------------------------------|--|---|
| <p><u>SR-FINRA-2010-061</u> – Financial Responsibility and Related Operational Rules</p> <p>Proposing to adopt FINRA Rules 4150, 4311, 4522 and 4523 and eliminate NASD Rule 3230 and NYSE Rules 322, 440.10, and 440.20</p> | <p>Rule Filing: 11/12/2010</p> <p>RN 09-03: 1/6/2009</p> | <p>Pending at SEC</p> | <p>2/20/2009 – Comment Letter Submitted to FINRA in Response to RN 09-03</p> | <p>FINRA Legislative History</p> <p>Related RN 09-03</p> <p>RN 09-03 Web Page and Comment Letters</p> |
| <p><u>SR-FINRA-2010-052</u> – Proposed Rule Change to Adopt FINRA Rules Regarding Books and Records in the Consolidated FINRA Rulebook</p> <p>Proposing to adopt, subject to certain amendments, certain paragraphs of NASD Rule 3110 and Incorporated NYSE Rule Interpretations 410/01 and 410/02.</p> | <p>Rule Filing: 10/20/2010</p> <p>RN 08-25: 5/14/2008</p> | <p>Comments Pending at SEC</p> | <p>11/22/2010 – Comment Letter Submitted to SEC in Response to FINRA’s Rule Filing</p> | <p>FINRA Legislative History</p> <p>Related RN 08-25</p> <p>RN 08-25 Web Page and Comment Letters</p> |

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| <p><u>SR-FINRA-2009-070</u> – Notice of Filing of Proposed Rule Change to Adopt NASD Interpretive Material 2210-2 into the Consolidated Rulebook as FINRA 2211 (Communications with the Public About Variable Insurance Products)</p> <p>Proposing to adopt FINRA Rule 2211 and to delete NASD IM-2210-2</p> | <p>Rule Filing: 12/3/2009</p> <p>RN 08-39: 7/28/2008</p> | <p>Comments Pending at SEC</p> | <p>3/8/2010 – Committee met with SEC/FINRA Staffs to review Committee’s Comment Letter submitted to SEC in response to FINRA’s rule filing</p> <p>12/30/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> <p>2/12/2009 – Committee met with SEC & FINRA Staffs to review Committee’s Comment Letter submitted to FINRA in response to RN 08-39</p> <p>9/30/2008 – Comment Letter submitted to FINRA in response to RN 08-39</p> | <p>SEC Comment Letters</p> <p>FINRA Legislative History</p> <p>FINRA Response to Comments</p> <p>FINRA Amended Rule Filing</p> <p>Related RN 08-39</p> <p>RN 08-39 Web Page and Comment Letters</p> |
| <p><u>SR-FINRA-2009-028</u> – Proposed Rule Change To Adopt FINRA Rule 2231 (Customer Account Statements)</p> <p>Proposing to adopt FINRA Rule 2231 and eliminate NASD Rule 2340 and NYSE Rule 409 (except for paragraph (f))</p> | <p>Rule Filing: 5/14/2009</p> | <p>Comments Pending at SEC</p> | <p>6/11/2009 – Comment Letter Submitted to SEC in Response to FINRA's Rule Filing</p> | <p>Multiple Extensions Filed (6) – <i>see</i> FINRA Legislative History Link</p> <p>SEC Comment Letters</p> <p>FINRA Legislative History</p> |

Summary of FINRA Rule Initiatives
(Last Updated 11/29/2010)

FINRA Rule Initiatives/Pending at FINRA

| Proposing Notice | Published | Status | Committee Action | Links to Additional Information |
|--|---------------------------------|---|--|--|
| <p><u>RN 10-54</u> – FINRA Requests Comment on Concept Proposal to Require a Disclosure Statement for Retail Investors at or Before Commencing a Business Relationship</p> <p>Proposing to require members firms, at or prior to commencing a business relationship with a retail customer, to provide a written statement to the customer describing the types of accounts and services it provides, as well as conflicts associated with such services and any limitations on the duties the firm otherwise owes to retail customers.</p> | <p>RN 10-54: 10/27/2010</p> | <p>Comment Period Expires: 12/27/2010</p> | <p>11/18/2010 – Comment Conference Call to Discuss Aspects of Proposal that Committee May Wish to Comment Upon</p> | <p>RN 10-54 Web Page</p> |
| <p><u>RN 10-33</u> – Supplemental FOCUS Information</p> <p>Proposing to enact FINRA Rule 4524, which would require the filing of supplemental FOCUS information.</p> | <p>RN 10-33: 7/19/2010</p> | <p>Comments Pending at FINRA</p> | <p>8/18/2010 - Comment Letter Submitted to FINRA in Response to RN 10-33</p> | <p>RN 10-33 Web Page and Comment Letters</p> |

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| <p><u>RN 10-25</u> – Registration and Qualification Requirements for Certain Operations Personnel</p> <p>Proposing to amend FINRA Rule 1230 and adopt FINRA Rule 1250, which expands the scope of NASD Rule 1120.</p> | <p>RN 10-25: 5/26/2010</p> | <p>Comments Pending at FINRA</p> | <p>7/30/2010 - Comment Letter Submitted to FINRA in Response to RN 10-25</p> | <p>RN 10-25 Web Page and Comment Letters</p> |
| <p><u>RN 10-01</u> – Membership Application Proceedings</p> <p>Proposing to adopt FINRA Rules 1111, 1112, 1121, 1130, 1140, 1150, 1160, 1170, and 1180, and overhaul a number of NASD and NYSE rules and interpretive materials relating to new member applications, continuing member applications, and application procedures</p> | <p>RN 10-01: 1/4/2010</p> | <p>Comments Pending at FINRA</p> | <p>3/5/2010 - Comment Letter Submitted to FINRA in Response to RN 10-01</p> | <p>RN 10-01 Web Page and Comment Letters</p> |
| <p><u>RN 09-70</u> – Registration and Qualification Requirements</p> <p>Proposing to adopt FINRA Rules 1210, 1220, 1230, and 1240, and overhaul a number of NASD and NYSE rules and interpretive materials relating to registration and qualification requirements</p> | <p>RN 09-70: 12/3/2009</p> | <p>Comments Pending at FINRA</p> | <p>3/1/2010 – Comment Letter Submitted to FINRA in Response to RN 09-70</p> | <p>RN 09-70 Web Page and Comment Letters</p> |

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| <p><u>RN 09-69</u> – Payments to Unregistered Persons</p> <p>Proposing to adopt FINRA Rule 2040 and streamline NASD Rules 1060(b), 2410, 2420, Interpretive Materials following NASD 2420, NYSE Rule 353, NYSE Rule Interpretations 345(a)(i)/01, 345(a)(i)/02, 345(a)(i)/03, and FINRA Rule 8311</p> | <p>RN 09-69: 12/2/2009</p> | <p>Comments Pending at FINRA</p> | <p>2/1/10 – Comment Letter Submitted to FINRA in Response to RN 09-69</p> | <p>RN 09-69 Web Page and Comment Letters</p> |
| <p><u>RN 09-55</u> – Communications With the Public</p> <p>Proposing to adopt FINRA Rule 2210 and eliminate NASD Rules 2210 and 2211, Interpretive Materials following NASD Rule 2210, and portions of Incorporated NYSE Rule 472</p> | <p>RN 09-55: 9/21/2009</p> | <p>Comments Pending at FINRA</p> | <p>11/20/2009 – Comment Letter Submitted to FINRA in Response to RN 09-55</p> | <p>RN 09-55 Web Page and Comment Letters</p> |
| <p><u>RN 09-22</u> – Personal Securities Transactions for or by Associated Persons</p> <p>Proposing to adopt FINRA Rule 3210 and eliminate NASD Rule 3050 and NYSE Rule 407</p> | <p>RN 09-22: 4/21/2009</p> | <p>Comments Pending at FINRA</p> | <p>6/5/2009 – Comment Letter Submitted to FINRA in Response to 09-22</p> | <p>RN 09-22 Web Page and Comment Letters</p> |

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| <p><u>RN 09-02</u> – Information and Data Reporting Filing Requirements</p> <p>Proposing to adopt FINRA Rule 4540 and eliminate NASD Rules 1160, 3150, 3170, IM-3150, and NYSE Rule 416A</p> | <p>RN 09-02: 1/6/2009</p> | <p>Comments Pending at FINRA</p> | <p>2/20/2009 – Comment Letter Submitted to FINRA in Response to RN 09-02</p> | <p>RN 09-02 Web Page and Comment Letters</p> |
| <p><u>RN 08-68</u> – Circulation of Rumors</p> <p>Proposing to adopt FINRA Rule 2030 and eliminate NASD Rules 6140(e), NYSE Rule 435(5) and related NYSE rule interpretations.</p> | <p>RN 08-68: 11/18/2008</p> | <p>Proposal Withdrawn and Re-Proposed in RN 09-29</p> | <p>12/18/2008 – Comment Letter Submitted to FINRA in Response to RN 08-68</p> | <p>RN 08-68 Web Page and Comment Letters</p> |
| <p><u>RN 08-24</u> – Supervision and Supervisory Controls</p> <p>Proposing to adopt FINRA Rules 3110 and 3120 and eliminate or replace parts of NASD Rules 3010, 3012, and NYSE Rule 342</p> | <p>RN 08-24: 5/14/2008</p> | <p>Comments Pending at FINRA</p> | <p>3/11/2010 – Committee met with SEC Staff to review Committee’s Comment Letter</p> <p>12/15/2009 – Committee met with FINRA Staff to review Committee’s Comment Letter</p> <p>6/13/2008 – Comment Letter Submitted to FINRA in Response to RN 08-24</p> | <p>RN 08-24 Web Page and Comment Letters</p> |