

Comment on Notice 2014-20

from Gerald Heilpern,

on Thursday, January 8, 2015

Comment:

This is my third comment on this issue. I feel that opposing the rule (as I have in my 2 previous emails) is not enough. As a substitute, I would like to recommend the following: A hard and fast markup/down rule of one percent. This would allow small firms to remain in the business without creating bad feelings as the disclosure rule would effect. Also, all prospectus items should be exempt from any changes