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June 13, 2011

William Francis Galvin
Secretary of the Commonwealth
Citizen Information Service
One Ashburton Place, Room 1611
Boston, MA 02108-1512

RE: Regulation of Expert Networks in Massachusetts

Dear Secretary Galvin,

I am contacting you regarding your planned regulation of expert networks in the Commonwealth of Massachusetts. I founded and run a small business that provides such services. We are based in Andover, and have been in business since 2005.

My concern is that such regulation not be onerous to implement or biased in favor of large firms at the expense of smaller ones like mine.

Throughout my company's history, we have placed the highest priority on creating an interaction between investing professionals and industry experts that is highly ethical and appropriate. We work closely with both our clients and our experts to help ensure this. For example:

- Both parties agree to a set of terms and conditions that plainly preclude among other things experts from disclosing material non-public information or other confidential information.
- Both parties are regularly reminded of their obligations.
- We carefully screen requests for appropriateness.

As I am sure you are aware, conversations with industry experts can be an invaluable tool in building a mosaic of research information. From my own years of experience in industry, on Wall Street, and as a provider of these services, I firmly believe that such interactions are appropriate and even necessary for the creation of a fair and efficient equity market.

This in no way implies the sharing of non-public, or otherwise inappropriate information, but rather from sharing the perspectives that can only come from working professionally within an industry. Again, from my own experience on Wall Street and working in industry, I know first hand how important this perspective is in making good decisions.

I welcome your proposed rules, particularly as the industry has suffered from negative publicity of late. This negative publicity is due to the actions of a few bad apples, who, in my opinion, would have behaved badly without the help of firms like mine. At the same time, I believe most legitimate firms are already complying with the spirit of the guidelines as I understand them.

I ask, though, that as you are shaping and implementing these rules that you fully consider the potential negative impacts that such rules could have on a small business in the Commonwealth

like mine. If improperly constructed, the implementation of such rules could be onerous and have a significant chilling effect on business.

For example, as is commonly understood within the industry today, a check box on a web form should be acceptable as a signature. Experts come from all over the globe and the collection of mechanical pen-and-paper signatures would be all but impossible, given the limited scope of the consulting assignments. It would also significantly lengthen the response time to our clients, thereby hampering our competitiveness.

Moreover, any such rules should be implementable without placing undue burden or cost on a small firm. The large expert firms that have been in the news have deeper pockets than my firm, but are not necessarily in a position to provide a more ethical expert consultation. Small firms have the ability, the will, and the close oversight necessary to ensure a high level of ethics, perhaps even to a greater extent than large firms.

I would very much welcome a chance to meet with you or your staff to discuss my concerns.

Sincerely,

Floyd S. Greenwood

CC: Senator Barry Finegold