

JOHN R. CLABORN & ASSOCIATES

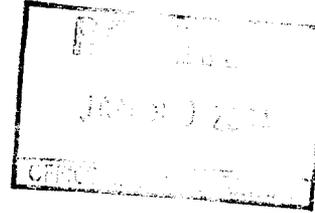
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SR-NASD-2003-104

January 21, 2004

Secretary
Securities and Exchange Commission
450 Fifth Street, NW
Washington, D.C. 20549-0609



Dear Mr./Ms. Secretary:

I operate a small insurance/financial services firm in Lubbock, Texas. I am forwarding this letter to you as an expression of some concerns I have pertaining to the proposed revision of the definition of "branch office" in Rule 3010(g)(2).

I maintain a detached office from my broker/dealer's branch office which too is located in Lubbock. I have an established agency which offers health insurance, life insurance and securities.

Because I have a community identity as a more diversified agency, the proposed rule change most likely would require me to stop offering securities entirely. The increased time requirement to engage in the same activities as my branch office would be counter productive and result in duplication of effort. I have strong ties to my branch office, but my community identity is centered on my agency.

Consequently, I feel it is important that the SEC reject the NASD proposal to revise the definition of "branch office" and keep the current definition in place.

The proposal should be amended to waive the filing fee for any non-branch location.

As I see it, many highly reputable professionals would opt out of securities dealings if the rule is amended as NASD proposes.

Thank you,


John R. Claborn

JRC/cc