

VIA Email
July 13, 2018

Dear Sirs:

In response to the Corporation Finance Section of the North American Securities Administrators Association Request For Comments Regarding Proposed New State Cover Sheets To Franchise Disclosure Documents, the Oklahoma Department of Securities offers the following comments:

1. On the proposed **What You Need To Know About Franchising Generally** page under the heading **Some States Require Registration** it states:

"Your state may have a franchise law that requires franchisors to register before offering or selling franchises in the state."

Oklahoma suggests such statement be revised to read:

Your state may have a franchise law, or other law, that requires franchisors to register before offering or selling franchises in the state.

2. The introductory language on the proposed **STATE EFFECTIVE DATES** page, does not appear to consider states e.g. Oklahoma that may require registration or exemption of a franchise under law other than a "franchise law."

Thank you for the opportunity to offer comments regarding the proposal. If you have any questions, please contact the undersigned.

Ken Maillard

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