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DIVISION OF
MARKET REGULATION

TATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

November 2, 1987

PUBLIC AVAILABILITY DATE: 12-02-87

Mr. Bernard Handel
Hudson Valley Planning Co.
53 Academy Street
Poughkeepsie, New York 12602

ACT	SECTION	RULE
1934	17(a)	17a-5

Dear Mr. Handel:

This is in response to your September 16, 1987 letter on behalf of Hudson Valley Planning Co. ("Hudson Valley") wherein you requested permission from the Division of Market Regulation (the "Division") to change your fiscal year end to December 31 and to file two successive annual audited reports as satisfaction of the requirements of Rule 17a-5 (17 C.F.R. §240.17a-5).

I understand the pertinent facts to be as follows: Hudson Valley is a registered broker-dealer. Hudson Valley succeeded Hudson Valley Planning Inc. ("Hudson Inc.") which had a June 30 fiscal year end. Hudson Inc. liquidated its assets in December 1986. Hudson Valley began operations in January 1987 and is required by Internal Revenue Service regulations to adopt a December 31 year end. Hudson Valley is required, pursuant to the provisions of paragraph (d) of Rule 17a-5, to file a certified annual report of financial statements on a calendar or fiscal year basis. Such report must be as of the same fixed or determinable date each year unless a change is approved by the Securities and Exchange Commission (the "Commission"). Hudson Valley chose June 30 as its audit date; therefore, Hudson Valley was required to prepare certified annual reports as of June 30, 1987. You request permission, on behalf of Hudson Valley, to adopt December 31 as a year end and to file two separate annual audit reports in fulfillment of the requirements of Rule 17a-5(d). One report would be filed by Hudson Inc. for the period from July 1, 1986 to December 31, 1986. The second report would be filed by Hudson Valley and would cover the period from January 1, 1987 to December 31, 1987.

The Division does not view your proposal as a workable alternative to the requirements of the Act. Paragraph (m) of Rule 17a-5 specifies that should a broker or dealer find it necessary to change its fiscal year, the firm should notify the Commission of such change. This notice of change of fiscal year must indicate whether the filing of the annual audit will

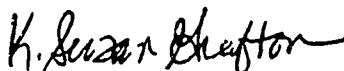
Mr. Bernard Handel
Page Two

be delayed. If the filing of the report will be delayed, the notice of change should include the representations required by Rule 17a-5(1)(1)(i). Rule 17a-5 (1)(1)(i)(E) requires that requests for exemptions or extensions be received prior to the date upon which the report is due. Paragraph (d)(5) of Rule 17a-5 requires that annual audits be filed not more than sixty (60) days after the date of the financial statements.

Hudson Valley chose June 30 as its audit date; therefore, Hudson Valley was required to file its annual audited financials on or before August 29, 1987. You have notified the Commission of Hudson Valley's change of fiscal year to December 31 and simultaneously requested to delay filing Hudson Valley's audited financials for the 1987 fiscal year until December 31. This request was not received by the Commission until September 22, 1987. As such, the Division is unable to grant your request and Hudson Valley remains required to file a certified annual report of financial statements for the June 30, 1987 fiscal year.

As to your request for permission to change the year-end of Hudson Valley to December 31, the Division will recommend no action to the Commission if Hudson Valley, in addition to filing the June 30, 1987 audit financials, prepares financial statements as of December 31, 1987 and every December 31 thereafter.

Sincerely,



K. Susan Grafton
Staff Attorney

cc: Richard Lee
New York Regional Office

Elizabeth Wollin - Automated Reports
National Association of
Securities Dealers, Inc.

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HUDSON VALLEY PLANNING CO.

Investments

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Poughkeepsie, New York 12602

Telephone: (914) 454-4041

SECURITIES & EXCHANGE COMMISSION
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SEP 22 1987

DIVISION OF MARKET REGULATION

September 16, 1987

Securities and Exchange Commission
Ben Ciccione
Jacob Javits Federal Building
26 Federal Plaza - Room 1102
New York, NY 10278

RE: Hudson Valley Planning Co. SEC File No. 8-37558

Dear Mr. Piccione:

We have received notice that we are delinquent in filing our Annual Audited Report with the NASD for the period ending June 30, 1987. In response to this notice, and pursuant to various SEC and NASD regulations, we would like to notify you of our request to have our fiscal year end changed to December 30.

We are a succession firm. Bernard Handel d/b/a Hudson Valley Planning Co. SEC File No. 8-37558, Firm ID No. 13-002245, succeeded Hudson Valley Planning Inc. SEC File No. 8-9874, Firm ID No. 13-002246, which had a year end of June 30. They liquidated their assets in December 1986. As such, Hudson Valley Planning Co. did not begin operation until January of 1987, and is required by IRS regulations to adopt a new fiscal year end of December 31.

We would like to request your approval to adopt December 31 as a year end and file two (2) separate Annual Audited Reports for the period in question. One would be from Hudson Valley Planning Inc. for the period July 1, 1986 to December 31, 1986, and one would be from Hudson Valley Planning Co. for the period January 1, 1987 to December 31, 1987.

If you need any additional information in this matter, please do not hesitate to call.

Sincerely,

Bernard Handel

cc: Securities and Exchange Commission-Washington DC
National Association of Securities Dealers-Rockville MD
National Association of Securities Dealers-Boston MA

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