



By **Electronic Mail** – rule-comments@sec.gov

January 3, 2022

Ms. Vanessa A. Countryman
Secretary of the Commission
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: Electronic Recordkeeping Requirements for Broker-Dealers, Security-Based Swap Dealers, and Major Security-Based Swap Participants – File Number S7-19-21

Dear Ms. Countryman:

The Futures Industry Association (“**FIA**”)¹ submits this letter to the Securities and Exchange Commission (“**SEC**” or the “**Commission**”) regarding the SEC’s proposed rule: Electronic Recordkeeping Requirements for Broker-Dealers, Security-Based Swap Dealers, and Major Security-Based Swap Participants (“**Proposed Rule**”).² Many of FIA’s members are Futures Commission Merchant (“**FCM**”) registrants with the Commodity Futures Trading Commission. Such FCMs may also be dually registered with the SEC or may work closely with affiliated entities that are SEC registrants. Thus, the Proposed Rule is of interest to FIA. FIA supports the Commission’s efforts to modernize its recordkeeping requirements and writes today to voice its support for the comments made by the Securities Industry and Financial Markets Association in its comment letter filed on December 22, 2021.³

FIA appreciates the opportunity to submit this letter for the SEC’s consideration. If members of the SEC or its staff have any questions or need any additional information, please contact Allison Lurton, FIA’s General Counsel and Chief Legal Officer at (202)-772-3057 or alurton@fia.org.

Respectfully submitted,

A handwritten signature in black ink that reads 'Allison Lurton'.

Allison Lurton
General Counsel and Chief Legal Officer

¹ FIA is the leading global trade organization for the futures, options, and centrally cleared derivatives markets, with offices in Brussels, London, Singapore and Washington, D.C. Our membership includes clearing firms, exchanges, clearinghouses, trading firms and commodities specialists from about 50 countries as well as technology vendors, law firms and other professional service providers.

² 86 Fed. Reg. 68300 (Dec. 1, 2021).

³ Letter from Melissa MacGregor, SIFMA, to Vanessa Countryman, SEC, Re: Electronic Recordkeeping Requirements for Broker-Dealers, Security-Based Swap Dealers, and Major Security-Based Swap Participants (Release No. 34-93614; File No. S7-19-2) (Dec. 22, 2021).