

From: [John Chuff](#)
To: [Comments, Public](#)
Subject: Comments on Lessons From the COVID-19 in response to Regulatory Notice 20-42
Date: Tuesday, February 16, 2021 4:51:06 PM

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To whom it may concern:

I am President of BA Securities, LLC, a broker-dealer with approximately 160 registered representatives engaged in investment banking and private placement activities. Our RRs are located in numerous offices across the country; these locations generally consist of a limited number of associated persons.

I am writing in response to FINRA's Request for Comments on Lessons from the Covid-19 Pandemic, specifically its request for comments on our experience with remote inspections of branch offices.

During the pandemic, and consistent with Rule 3110.17, we have conducted our branch office inspections remotely. Our experience has been that remote inspections work well and can accomplish their goals in an efficient and effective manner. In fact, because the pressure and time associated with travel is not a factor, our remote meetings can at times be even more effective than in person meetings, because they allow for a more relaxed and deeper discussion and/or exploration of key topics and concerns.

Our firm has used both telephonic and teleconferencing meetings to conduct our remote inspections. The meetings are organized in the first instance around a multi-part questionnaire focused on areas of high concern, e.g. (i) cybersecurity and the protection of client information, (ii) file maintenance, (iii) correspondence, advertising and sales literature, and (iv) location procedures and identification. In addition, the remote meetings give us the opportunity to review key aspects of our Written Supervisory Procedures, e.g. surrounding (i) OBAs and PSTs, (ii) political contributions and gifts and (iii) recommended products and finder's fees.

We believe that remote inspections can be highly effective and we recommend that they be permanently allowed.

Regards,

John Chuff

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