

As a Chief Compliance Officer and Registered Principal in the industry, I would question why this registration category would be necessary?

All of the functions of these roles are already required to be supervised by a registered principal in the industry. Also, to the extent these personnel are involved in handling customer funds/assets, etc they go through a background check and fingerprinting process already which serves to protect the public. I am not sure what would be gained by requiring registration.

As a small firm, one impact I see immediately is that this change would dramatically limit the pool of candidates we can consider hiring when needing to make personnel changes in our back office. This is a service area of a firm where often turnover can occur (whether voluntary or involuntary) and adding a requirement for registration significantly limits the number of available candidates.

Please consider what is really gained by this change? We already have registered principals responsible for all operational areas of activity. I would view this change as unnecessary and not truly beneficial to the industry as a whole.

Respectfully submitted,

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