

SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

November 2, 1983

Mr. James Cangiano

National Association of Securities Dealers, Inc.

1735 K Street, N.W. Washington, D.C. 20006

Dear Mr. Cangiano:

In your letter of May 27, 1982, you raised the question under Securities Exchange Act Rule 17a-4 (17 CFR 240.17a-4) whether the main office of a broker-dealer must maintain records at the main office which have originated at a branch office.

Rule 17a-4 requires that the records required to be preserved by that Rule be maintained in "an easily accessible place." That has been construed to mean that the records must be preserved at the principal place of the business of the broker-dealer.

The Division however will not recommend any action to the Commission if a broker or dealer chooses to maintain records at a branch office where the records have originated at the branch office if the broker or dealer agrees to transmit to its main office at the request of Commission representatives or representatives of its designated examining authority the original or copies of the records maintained in the branch offices within 36 hours after requested by the representatives.

Sincerely,

Michael A. Macchiaroli

Assistant Director

NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

1735 K STREET NORTHWEST WASHINGTON, D.C. 20006

(202) 833-7200

May 27. 1982

Mr. Michael A. Macchiaroli

Division of Market Regulation

Securities and Exchange Commission

500 N. Capitol Street

Washington, D.C. 20549

Dear Mike:

Please find enclosed a copy of the letter from Jack Rosenfield to myself which I mentioned briefly to you during our recent telephone conversation.

Once again, the inquiry deals with the maintenance of records under Rule I 7a-4, and whether or not a main office must maintain records originating at a branch office. As I also indicated to you, there was some confusion over my original response to that inquiry, and I asked you to ignore the first paragraph of Jack's letter.

Your prompt reply will be most helpful.

Sincerely,

James M. Cangiano

Assistant Director

Department of Policy Research