



VOICE OF INDEPENDENT FINANCIAL SERVICES FIRMS  
AND INDEPENDENT FINANCIAL ADVISORS

## VIA ELECTRONIC MAIL

May 14, 2013

Elizabeth M. Murphy  
Secretary  
Securities and Exchange Commission  
100 F Street, NW  
Washington, DC 20549-1090

### **RE: Proposed Regulation Systems Compliance and Integrity**

Dear Ms. Murphy:

On March 8, 2013, the Securities and Exchange Commission (SEC) released proposed Regulation Systems Compliance and Integrity (Regulation SCI),<sup>1</sup> requesting comment on a comprehensive set of new requirements for certain regulated entities' automated systems. Regulation SCI would require certain "SCI entities" to establish written policies and procedures designed to ensure the resiliency and operational capacity of their systems and require additional reporting and testing.

The Financial Services Institute<sup>2</sup> (FSI) requests that the SEC extend the comment deadline for an additional 90 days to provide commenters sufficient time to fully analyze the proposal and gather information with respect to the more than 200 specific requests for comment. Specifically, FSI and its members require additional time to analyze and respond to the proposal's solicitation of comment regarding the potential inclusion of broker-dealers other than SCI ATs within the definition of SCI Entity.<sup>3</sup> We are also aware that SIFMA, FIF, and several registered

---

<sup>1</sup> Regulation Systems Compliance and Integrity, Release No. 34-69077 (Mar. 8, 2013), 78 Fed. Reg. 18,084 (March 25, 2013).

<sup>2</sup> The Financial Services Institute, Voice of Independent Broker-Dealers and Independent Financial Advisors, was formed on January 1, 2004. Our members are broker-dealers, often dually registered as federal investment advisers, and their independent contractor registered representatives. FSI has 100 Broker-Dealer member firms that have more than 138,000 affiliated registered representatives serving more than 14 million American households. FSI also has more than 35,000 Financial Advisor members.

<sup>3</sup> See 78 FR at 18138 (Section G: "Solicitation of Comment Regarding Potential Inclusion of Broker-Dealers, Other than SCI ATs, and Other Types of Entities").



VOICE OF INDEPENDENT FINANCIAL SERVICES FIRMS  
AND INDEPENDENT FINANCIAL ADVISORS

securities exchanges have submitted requests for an extension of the comment period and we support the reasons cited in their letters.<sup>4</sup>

We are committed to constructive engagement in the regulatory process and, therefore, welcome the opportunity to work with the SEC on this and other important regulatory efforts.

Thank you for your consideration of our comments. Should you have any questions, please contact me directly at (202) 803-6061.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. T. Bellaire".

David T. Bellaire, Esq.  
Executive Vice President & General Counsel

---

<sup>4</sup> See SIFMA Letter, <http://www.sec.gov/comments/s7-01-13/s70113-10.pdf>; FIF Letter, <http://www.sec.gov/comments/s7-01-13/s70113-14.pdf>; BATS Letter, <http://www.sec.gov/comments/s7-01-13/s70113-15.pdf>.