



Insured Retirement Institute
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www.IRIONline.org
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January 3, 2022

Submitted Online via SEC Comment Portal at: <https://www.sec.gov/cgi-bin/ruling-comments>

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street, NW
Washington, DC 20549-1090

Re: File No. S7-19-2

Electronic Recordkeeping Requirements for Broker-Dealers, Security-Based Swap Dealers, and Major Security-Based Swap Participants

Dear Ms. Countryman:

On behalf of the Insured Retirement Institute ([IRI](#))¹, we thank you for the opportunity to comment in response to the U.S. Securities and Exchange Commission's ([SEC](#)) proposed amendments (the [Proposed Rule](#)) to the electronic recordkeeping requirements for broker-dealers pursuant to Rule 17a-4 ([Rule 17a-4](#)) under the Securities Exchange Act of 1934, as amended (the [1934 Act](#)).²

IRI has received and reviewed the comments by the Committee of Annuity Insurers ([CAI](#)), as submitted on or about January 3, 2022. With CAI's permission, IRI shared CAI's comment letter with our members.

Following discussion with our members, IRI supports CAI's comments, as they focus on the aspects of the Proposed Rule pertaining to its broker-dealer requirements. Therefore, we align with CAI where it expresses general support of the Proposed Rule. Furthermore, IRI respectfully requests the SEC consider the specific comments to the Proposed Rule in accordance with CAI's identified issues and recommendations.

¹ IRI is the leading association for the entire supply chain of insured retirement strategies, including life insurers, asset managers, and distributors such as broker-dealers, banks, and marketing organizations. IRI members account for more than 95 percent of annuity assets in the U.S., the top 10 distributors of annuities ranked by assets under management and are represented by financial professionals serving millions of Americans. IRI champions retirement security for all through leadership in advocacy, awareness, research, and the advancement of digital solutions within a collaborative industry community.

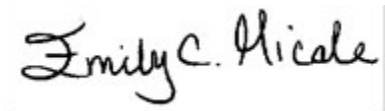
² The SEC's release on the proposed rulemaking is posted at <https://www.sec.gov/rules/proposed/2021/34-93614.pdf> ("[Proposing Release](#)").

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Thank you again for the opportunity to share IRI's comments with respect to this important matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Emily C. Micale". The signature is written in a cursive style and is contained within a thin black rectangular border.

Emily Micale