

Morgan Stanley

July 08, 2015

By Electronic Mail (rule-comments@sec.gov)

Robert W. Errett
Deputy Secretary
Securities and Exchange Commission
100 F Street, N.E., Washington, D.C.
20549-1090

Re: SR-FINRA-2015-015: FINRA Proposal to Provide Web-Based Delivery of Regulatory Element of Continuing Education Requirement

Dear Mr. Errett:

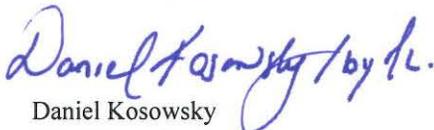
Morgan Stanley Smith Barney LLC and Morgan Stanley & Co. LLC (together, "Morgan Stanley") appreciate the opportunity to comment on the referenced rule proposal by the Financial Industry Regulatory Authority ("FINRA") to amend FINRA Rule 1250 (Continuing Education Requirements) (the "Rule Proposal").

Morgan Stanley strongly supports FINRA's proposal to provide a web-based delivery method for completing the Regulatory Element of Continuing Education requirements. Morgan Stanley believes the Rule Proposal will allow member firms and FINRA to benefit from available technological advances, as well as reduce costs associated with administrative fees and employee time spent away from the office.

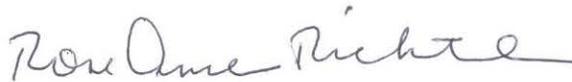
We believe that, by requiring a candidate to provide a portion of their Social Security Number ("SSN"), the Rule Proposal includes appropriate authentication safeguards for U.S. citizens, but we note that this form of authentication may be problematic for non-U.S. citizens holding a U.S. license. Morgan Stanley respectfully requests that FINRA consider the use of alternative identifiers, such as a passport number, green card number (if available) or FINRA registration number, for those candidates who do not have a SSN.

We understand that this Rule Proposal is part of a comprehensive reevaluation by FINRA of its licensing and registration regime in light of advances in technology and changes in the business over the past few decades. We appreciate FINRA's willingness to engage the industry in the dialogue about these changes, and we urge the SEC to approve the current Rule Proposal.

Respectfully submitted,



Daniel Kosowsky
Chief Compliance Officer
Morgan Stanley Smith Barney LLC



Rose-Anne Richter
Chief Compliance Officer
Morgan Stanley & Co. LLC