

**ARM** Association of  
Registration  
Management  
Post Office Box 133, Bowling Green Station, New York, NY 10274

July 8, 2015

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

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

Dear Mr. Errett,

The Association of Registration Management, Inc. ("ARM") would like to take the opportunity to comment on the amendments, proposed by the Financial Regulatory Authority ("FINRA"), to FINRA Rule 1250. This revised rule would allow registered representatives to meet the Regulatory Element of their Continuing Education ("CE") requirement through a web-based interface or other technological manner.

ARM is an organization that exists for the primary purpose of representing the financial services industry on issues that concern the registration and licensing functions. The organization, which started in 1975, has now provided that representation for 40 years. ARM appreciates the opportunity to submit this letter and present feedback collected from the financial securities industry on this topic and the related process.

Along with our member firms, ARM has reviewed both the FINRA proposal and comment letter provided by our colleagues in the Securities Industry and Financial Markets Association ("SIFMA"). ARM supports both the FINRA proposal and the comments in the SIFMA letter. The web-based delivery plan provides a more convenient and efficient manner for registered representatives to complete their CE requirement, while allowing FINRA member firms to save on both CE fees and the costs related to man hours.

The FINRA proposal includes a phased implementation plan, where the S106 (for Investment Company and Variable Contracts Representatives), S201 (for registered principals), and S901 (for registered Operations Professionals) CE programs are provided through web-delivery on October 1, 2015; while the S101 (for all other securities registration categories) program is launched on January 4, 2016. ARM believes that this phased plan is the correct approach for introducing this new delivery method, and reiterates SIFMA's request for flexibility with CE deadlines for those individuals that may encounter technological difficulties that occur with this new interface.

ARM encourages FINRA to provide more information about their plans to address these technological difficulties, should they occur. The proposal does not include details on plans to provide technical support for questions related to web-browser compatibility, firewall issues, access concerns, or any other technological or operational issues that could delay or prevent the completion of the CE requirement. ARM looks forward to working with FINRA and welcomes the opportunity to provide suggestions on how this technical support could be provided.

ARM must also echo SIFMA's request for guidance on operational and technological issues. Help guides, user instructions, and "frequently asked questions" documents are critical to minimize confusion about completing CE requirements through this new process. Additionally, ARM suggests that FINRA conducts information sessions for employees of the Compliance, IT, and, Registration Departments of FINRA member firms to better prepare for questions and issues that their registered representatives may raise about the new CE delivery method and related completion process. These sessions will allow member firms to directly address many of the concerns of their registered representatives, without those individuals contacting FINRA support.

ARM agrees with SIFMA's call for clarification on the level of information that will be available to member firms regarding CE sessions that are in-progress. To assist their registered representatives in meeting their requirements before the CE deadline, our member firms would appreciate information about when an individual CE session was accessed, when it was paused or stopped, and how much of the program session was completed.

ARM requests that FINRA provide more information about the authentication process, specifically detailing how individuals without social security numbers would be verified. A number of registered representatives from our member firms do not have social security numbers, as these individuals are non-US citizens located in the US or abroad. ARM would like more

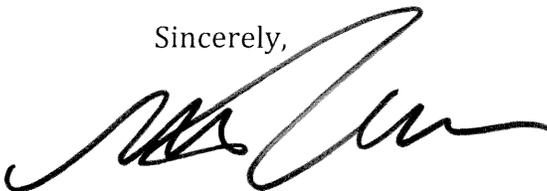
information on an authentication process that can be used as an alternative to social security numbers for these representatives

Finally, ARM appreciates the language and approach to this proposed amendment, which provides FINRA with the opportunity to change delivery methods to different technologies in the future without requiring additional rule changes. ARM has history of strong collaboration with FINRA on registration-related technological changes, and the organization is confident that FINRA will continue to seek industry participation and support for future updates.

ARM commends FINRA for working to update their CE delivery methods, and looks forward to the related savings and improved efficiency. Our organization looks forward to learning more about the support plans, technological and operational guidance, and alternatives to social security numbers to improve this plan even further.

Thank you for your time and consideration. Please contact me if you wish to discuss the matter in more detail, if you have any questions, or if I can assist with this issue any further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michele Van Tassel', written in a cursive style.

Michele Van Tassel  
President, Association of Registration Management

