

February 16, 2022

Submitted electronically

Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Re: SR-FINRA-2022-001, Notice of Filing and Immediate Effectiveness of a Proposed Rule Change to Extend the Effectiveness of Temporary Supplementary Material .17 (Temporary Relief to Allow Remote Inspections for Calendar Years 2020 and 2021, and Through June 30 of Calendar Year 2022) under FINRA Rule 3110 (Supervision).

Dear Ms. Countryman:

LPL Financial LLC (“LPL” or “the Firm”) appreciates the opportunity to submit comments in response to the U.S. Securities and Exchange Commission’s (“the Commission”) solicitation of public comments regarding the proposed rule change filed by the Financial Industry Regulatory Authority (“FINRA”) to extend temporary relief and allow for remote inspections through the end of calendar year 2022. Since the beginning of the coronavirus pandemic, LPL has utilized remote inspections and we are supportive of the extension of relief. Further, we urge FINRA and the Commission to consider a permanent rule change that allows remote examinations to continue using a risk-based approach.

I. Overview of LPL

LPL is a leading retail investment advisory firm, independent broker-dealer and registered investment advisor custodian. We serve more than 19,000 independent financial professionals and over 800 financial institutions by providing them with the technology, research, clearing and compliance services, and practice management programs they need to create and grow thriving practices. LPL enables them to provide guidance to millions of American families seeking wealth management, retirement planning, financial planning and asset management solutions. LPL also supports a network of over 400 independent registered investment advisers (“RIAs”) through the country by providing them with access to a range of products, platforms, and services. LPL is not a security-based swap dealer.

II. Support for Proposal and Extension of Temporary Relief for Remote Inspections


Since the start of the coronavirus pandemic, LPL has utilized remote branch exams to inspect our branch offices. This allowed LPL to leverage advances in technology to perform branch exams, while prioritizing the health and well-being of our branch examiners. We are thankful for FINRA, the SEC, and NASAA’s continued leadership on this issue.

Over the past three years, LPL has performed an average of 7,780 branch exams per year. This includes 9,758 exams in 2021 alone, during the height of the pandemic. Our branch exam program is robust and extensive. It is also continuously improving. We have taken the lessons learned from the start of the pandemic to fine-tune the program into one that appropriately identifies deficiencies while utilizing tools and pre-screening to create an efficient experience.

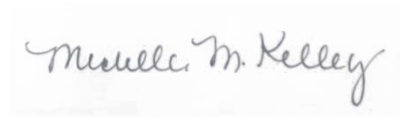
Permanent Remote Branch Exam Program

Building on the success of the remote branch exam program, we ask the SEC and FINRA to consider making the relief permanent and adopting a risk-based approach for branch exams. Although firms were forced to pivot quickly to establish remote branch exams, we believe that the industry and regulators recognize that they are a success and one of the lessons learned during the pandemic that can be continued in the future.

Conclusion

LPL appreciate the opportunity to support FINRA's proposal to extend temporary relief for remote branch examinations. Thank you for your consideration of this letter. Please contact Tara Gilchrist at  with any questions.

Sincerely,



Michelle M. Kelley
Senior Vice President
Associate General Counsel