

July 21, 2022

Ms. Vanessa Countryman
Secretary, Securities and Exchange Commission
100 F St., NE Washington, DC 20549

Re: Publication of Aggregated Transaction Information on U.S. Treasury Securities (SR-FINRA-2022-017)

Dear Ms. Countryman,

We appreciate the opportunity to respond to FINRA’s proposal to publish aggregated transaction information on U.S Treasury securities more frequently, such as on a daily basis.¹ The U.S. Treasury market is the deepest and most liquid government securities market in the world, and plays a pivotal role in both the U.S. and global economies. The liquidity, integrity and resiliency of the U.S. Treasury market support the efficient funding of the U.S. government and the widespread use of Treasuries as an investment and hedging instrument globally.

Since July 2017, SEC-registered broker-dealers that are FINRA members have reported their transactions in U.S. Treasury securities to TRACE. Beginning in March 2020, FINRA took the initial step of publishing on its website aggregated weekly Treasury trading volume statistics. We believe the publication of TRACE data has contributed to a better understanding of Treasury market dynamics.²

We support FINRA’s proposal to publish aggregated U.S. Treasury security transaction information and statistics on a more frequent basis. Dissemination of more frequent aggregated transaction information will facilitate a better and more timely understanding of overall trading activity in U.S. Treasury securities. The greater insight into trading volumes by security type and market segment will also improve the efficiency of the U.S. Treasury market.

While we believe FINRA’s proposal is another positive incremental step in enhancing transparency in the U.S. Treasury market, far more significant benefits will accrue once investors have access to comprehensive and real-time trade information, as is the norm in other major asset classes including equities, options, corporate bonds, and swaps. We are encouraged by the Department of Treasury’s recent request for information on implementing a comprehensive post-

¹ Notice of Filing of a Proposed Rule Change to Amend FINRA Rule 6750 Regarding the Publication of Aggregated Transaction Information on U.S. Treasury Securities, 87 Fed. Reg. 39,573 (July 1, 2022).

² See generally Regulation ATS for ATSS That Trade U.S. Government Securities, NMS Stock, and Other Securities; Regulation SCI for ATSS That Trade U.S. Treasury Securities and Agency Securities; and Electronic Corporate Bond and Municipal Securities Markets, 85 Fed. Reg. 87,106 (Dec. 31, 2020); Recent Disruptions and Potential Reforms in the U.S. Treasury Market: A Staff Progress Report, Inter-Agency Working Group for Treasury Market Surveillance (Nov. 8, 2021) available at <https://home.treasury.gov/system/files/136/IAWG-Treasury-Report.pdf>.

trade transparency framework in the U.S. Treasury markets,³ and support further rulemakings to disseminate transaction-level information.

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We appreciate the opportunity to provide comments on FINRA’s proposal. Please feel free to contact the undersigned with any questions regarding these comments.

Respectfully,

/s/ Stephen John Berger
Managing Director
Global Head of Government & Regulatory Policy

³ See generally Notice Seeking Public Comment on Additional Transparency for Secondary Market Transactions of Treasury Securities, 87 Fed. Reg. 38,259 (June 27, 2022); see also U.S. Treasury Markets: Steps Toward Increased Resilience, Group of Thirty (2021) available at <https://group30.org/publications/detail/4950>.