

# BLACKROCK®

July 9, 2018

Submitted via electronic filing: <https://www.sec.gov/cgi-bin/ruling-comments>

Mr. Brent J. Fields  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

**Re: SEC Notice of Filing of a Proposed Rule Amendment to the Fair Access to Investment Research Act of 2017**  
**[Release Nos. 33-10498; 34-83307; IC-33106; File No. S7-11-18]**

Dear Mr. Fields:

This letter responds to the request of the Securities and Exchange Commission (“Commission” or “SEC”) for comment on proposed Rule 139b, under the Securities Act of 1933 and directed by the Fair Access to Investment Research Act of 2017 (the “Proposal”).<sup>1</sup>

BlackRock, Inc. (together with its affiliates, “BlackRock”)<sup>2</sup> appreciates the SEC taking up this matter and encourages the Commission to move the Proposal forward. Additionally, BlackRock agrees with the comments made by the Investment Company Institute (ICI) in their comment letter which opines on specific aspects of the Proposal.

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We thank the Commission for providing BlackRock the opportunity to express our support for the Proposal. Please contact the undersigned if you have any questions or comments regarding BlackRock’s views.

Sincerely,

Samara Cohen  
Global Head of Public Policy, BlackRock ETF & Index Investing

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<sup>1</sup> <https://www.sec.gov/rules/proposed/2018/33-10498.pdf>

<sup>2</sup> BlackRock is one of the world’s leading asset management firms. We manage assets on behalf of institutional and individual clients worldwide, across equity, fixed income, liquidity, real estate, alternatives, and multi-asset strategies. Our client base includes pension plans, endowments, foundations, charities, official institutions, insurers, and other financial institutions, as well as individuals around the world.