

August 23, 2022

Ms. Vanessa Countryman  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549-1090

Re: File No. SR 2022-19

Dear Ms. Countryman:

On behalf of LPL Financial ("LPL"), I am writing to express our support for the Financial Industry Regulatory Authority ("FINRA") proposed rule change to adopt new Supplementary Material .19 under FINRA Rule 3110. This proposal, which would create a new definition for Residential Supervisory Location, is the culmination of industry collaboration with the Securities and Exchange Commission ("SEC") and FINRA to allow firms to continue to leverage technology and workplace advances for a hybrid workforce.

LPL is a leading retail investment advisory firm, independent broker-dealer and registered investment advisor (RIA) custodian. We serve as a trusted partner to more than 20,000 independent financial advisors, professionals and over 1,100 institution based programs 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 affiliated financial professionals to provide objective financial guidance to millions of American families seeking wealth management, retirement planning, financial planning and asset management solutions.

The onset of the coronavirus pandemic led to workplace disruptions and forced firms to turn to remote work. Many workers that had typically been in an office for five days a week started to work from a residence for the first time, with significant uncertainty as to when it would be safe to return to an office. During this time, it became clear that many functions could be done efficiently at home. Further, offering workers the ability to work on a hybrid basis, from both a traditional office location and a residence, allows firms to be competitive employers. This rule change will help attract talent and deepen the breadth of workers in the financial services sector.

LPL strongly supports FINRA's proposal. We recognize that technology has advanced to sufficiently allow for electronic surveillance and monitoring at any location, which means that a worker does not need to be located in a branch office. Additionally, we urge both FINRA and the SEC to allow for remote branch examinations on a permanent basis. This rule change would further recognize that recent technology advances allow firms to monitor and mitigate risk without being onsite.

Thank you for your consideration of this letter. Please contact Tara Gilchrist, SVP, Head of Branch Exams at [REDACTED] with any questions.

Sincerely,



Mark Seffinger  
Chief Compliance Officer