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September 6, 2022

Vanessa A. Countryman  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

Via Email: [rule-comments@sec.gov](mailto:rule-comments@sec.gov)

Re: Proposed Rule Change to Adopt Supplementary Material .18 (Remote Inspections Pilot Program) under FINRA Rule 3110 (Supervision); File No. SR-FINRA-2022-021; Release No. 34-95452

Dear Ms. Countryman,

D.A. Davidson & Co. ("Davidson") provides this comment letter to the Securities and Exchange Commission (the "SEC") in support of the Financial Industry Regulatory Authority Inc.'s ("FINRA") File No. SR-FINRA-2022-021: Proposed Rule Change to Adopt Supplementary Material .18 (Remote Inspections Pilot Program) under FINRA Rule 3110 (Supervision) (the "Remote Inspection Proposal").

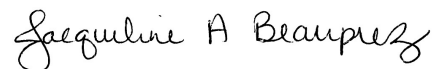
Davidson is supportive of this Remote Inspection Proposal because it allows for modernization of FINRA Rule 3110(c) and builds on the successful execution of remote inspections since the beginning of the COVID-19 pandemic. The Risk-Based Approach described in the Remote Inspection Proposal is reasonable and should provide FINRA with sufficient metrics to determine if remote inspections should become a permanent option for firms while still ensuring investor protection.

On March 16, 2020, many of Davidson's employees were transitioned to primarily working from home as necessitated by the COVID-19 pandemic. Davidson's branch examination staff was able to design a remote inspection program leveraging technologies such as Zoom video to remotely inspect the maintenance of books and records, safeguarding of customer funds and securities and branch security. In addition, since many books and records are centrally maintained in an electronic format, as was also the case pre-COVID-19 pandemic, a significant portion of the branch inspection process was and will continue to be conducted prior to any onsite inspection and without the need to involve the branch office being inspected absent any questions or issues.

Upon the adoption of Supplementary Material .17 Temporary Relief to Allow Remote Inspections for Calendar Years 2020 and 2021, and Through December 31 of Calendar Year 2022, Davidson's remote inspection program has been successfully implemented and findings identified were not dissimilar than

those in 2019 and prior years when 100% of branch inspections were conducted in person. Thus, Davidson is hopeful that the SEC will adopt FINRA's Remote Inspection Proposal, and will do so prior to the expiration of Supplementary Material .17 which expires on December 31, 2022.

Sincerely,



Jacqueline A. Beauprez  
Senior Vice President  
General Counsel and Chief Compliance Officer



Brian Zellner  
Vice President  
Director of Wealth Management Compliance