



MML Investors Services, LLC
1295 State Street
Springfield, MA 01111-0001
Toll Free (800)542-6767
Fax (877)665-4749

May 24, 2023

Via ELECTRONIC Mail (rule-comments@sec.gov)

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

Re: Proposed Rule Change to Adopt Supplementary Material.18 (Remote Inspections Pilot Program) Under FINRA Rule 3110 (Supervision); File No. SR-FINRA-2023-007, Release No. 34-97398

Dear Secretary,

MML Investors Services, LLC ("MMLIS") appreciates this opportunity to provide the Securities and Exchange Commission (the "Commission" or "SEC") with comments in response to the Financial Industry Regulatory Authority Inc.'s ("FINRA") File No. SR-FINRA-2023-007: Proposed Rule Change to Adopt Supplementary Material .18 (Remote Inspection Pilot Program) under FINRA Rule 3110 (Supervision) (the "Proposal").¹

On September 6, 2022, MMLIS provided comments and expressed its general support with respect to FINRA's prior proposal (File No. SR-FINRA-2022-021). Once again, MMLIS would like to take this opportunity to thank the SEC, FINRA, NASAA, and their respective staffs for their efforts and responses during times of uncertainty due the COVID-19 pandemic. MMLIS applauds the significant effort that FINRA and its staff have invested in the re-drafting of the Proposal and thanks FINRA for working with its fellow regulators and the industry to craft the Proposal.

MMLIS is a subsidiary of Massachusetts Mutual Life Insurance Company ("MassMutual"). MMLIS is MassMutual's retail broker-dealer and is headquartered in Springfield, Massachusetts. The firm offers a variety of investment products and services to retail clients, including mutual funds and variable products.

¹ FINRA, Proposed Rule Change to Adopt Supplementary Material. 18 (Remote Inspection Pilot Program) under FINRA Rule 3110 (Supervision), File No. SR-FINRA-2023-007, Release 34-97398 (May 4, 2023), [NOF-FINRA-2023-007.pdf](#).

Comments from MMLIS:

MMLIS would like to express its support of FINRA's Proposal to adopt Supplementary Material .18 under FINRA Rule 3110, given that the shift towards remote work is only growing and member firms are adopting permanent remote work arrangements. The proposed Pilot Program would mitigate potential disruptions to the current hybrid work arrangements that have developed since the pandemic. Further, MMLIS believes that the Proposal, as drafted, preserves investor protection through the proposed safeguards while also providing FINRA the opportunity to gauge the effectiveness of remote inspections as part of a modernized, reasonably designed supervisory system that reflects the current work environment and availability of technologies that did not exist when the on-site inspection requirements were originally conceived.

MMLIS devotes significant resources to ensure that it has reasonable policies, procedures, and controls in place to comply with industry regulations. In fact, MMLIS continues to strengthen and improve its supervisory controls in its operations and risk management areas.

Residential Supervisory Location Proposal

MMLIS encourages the SEC to consider the Proposal in conjunction with FINRA's related proposal concerning Residential Supervisory Location Proposal². Since the height of the pandemic, most companies have adopted a hybrid work environment, with most employees splitting their working hours between their firm's office and a remote location or working entirely remotely. These remote locations are generally located in a personal residence. This flexibility in alternative work arrangements has been crucial to the recruitment and retention of qualified individuals within our industry. MMLIS believes the Residential Supervisory Location Proposal will enable firms to recruit underrepresented talent more effectively, particularly where firms may be in locations that do not have a local source of diversity.

Conclusion

MMLIS appreciates the opportunity to provide comments on the Proposal and urges the SEC, FINRA, and NASAA to continue the path towards formalizing it. MMLIS thanks FINRA, the SEC, NASAA and their staff for their efforts on the Proposal, its changes represent a solid step forward in modernizing FINRA's rules and recognizing the continued importance to hybrid work.

² FINRA, Proposed Rule Change to Adopt Supplementary Material. 19 (Residential Supervisory Location) under FINRA Rule 3110 (Supervision), File No. SR-FINRA-2022-006, (April 6, 2023), [SR-FINRA-2023-006-federal-register-notice.pdf](#).

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If you should have any further questions, please do not hesitate to contact me.

Best Regards,

A handwritten signature in black ink, appearing to read 'Karol Sierra-Yanez', written over a horizontal line.

Karol Sierra-Yanez

Lead, Counsel, Broker-Dealer and Investment Advisor Practice Group