



August 29, 2023

**VIA ELECTRONIC MAIL (rule-comments@sec.gov)**

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

Re: File No. SR-FINRA-2023-007; Release No. 34-97398 (the "Pilot Program")

Dear Ms. Countryman:

Citigroup Global Markets Inc., ("CGMI") appreciates this opportunity to provide the Securities and Exchange Commission (the "Commission" or "SEC") with comments in response to File No. SR-FINRA-2023-007; Remote Inspections Pilot Program under FINRA Rule 3110 (Supervision). CGMI supports the proposed Remote Inspections Pilot Program. The regulatory modernization embodied in this Pilot Program would benefit investor protection. It increases our ability to recruit and retain qualified inspection staff and improves our efficiency to focus on higher-risk areas, both essential parts of a reasonably designed supervisory program.

The Pilot Program leverages modern processes and technologies implemented by our firm to conduct remote inspections effectively, as we have been doing throughout the COVID-19 pandemic. It would enable our firm to recruit and retain qualified staff that can perform inspections of lower-risk locations remotely and perform inspections of higher-risk locations more efficiently and effectively. CGMI values onsite inspections, as warranted, to provide a valuable compliance and relationship-building experience. We believe the Pilot Program is reasonably designed to assess the success of remote inspections in a structured manner for purposes of considering a permanent rule change.

We encourage the Commission to approve the Pilot Program expeditiously, helping us to set expectations for the future of our workplace, and to provide us enough time to implement the pilot's numerous requirements. We appreciate the opportunity to provide our views on this matter and would be happy to answer any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "S - Kursman".

Scott C. Kursman  
Managing Director & Chief Compliance Officer  
Citigroup Global Markets, Inc.