

VIA ELECTRONIC SUBMISSION

Ronald W. Smith
Corporate Secretary
Municipal Securities Rulemaking Board
1300 I Street NW, Suite 1000
Washington, DC 20005

2/26/24

Re: MSRB Notice 2023-11 – Request Information on Impacts of MSRB Rules on Small Firms

Mr. Smith,

Thank you for the opportunity to respond to the MSRB's request for comment on areas of regulations that could be considered burdensome by small firms.

This letter will focus on MSRB Rule G-27 and specifically that portion of the Rule that requires the designation of one or more appropriately registered principals in each office of municipal supervisory jurisdiction (OMSJ).

Like many other firms, on March 13, 2020, Regional Brokers, Inc. (RBI) closed its office and made arrangements for its employees to work from home. RBI has made a corporate decision to maintain the "work from home" model going forward. Until now, RBI has utilized the relief granted by FINRA and the MSRB under which RBI was not required to designate these homes as "offices".

Now, however, that relief is ending, and RBI will need to fulfill the supervisory requirements of MSRB Rule G-27 related to these homes.

If these home offices are required to be designated as OMSJ, as it is indicated under G-27(g) "Definitions", due to order taking or market making, the Rule will require the persons in those newly identified "offices" to acquire a Series 53.

However, since any persons working alone in those offices **cannot supervise themselves**, they will have to be supervised by some other principal at a separate location, rendering their 53 meaningless.

It can certainly be identified as a "burden" if the MSRB will require perhaps hundreds of persons in the industry to study for and acquire a license that they can never use.

Common sense says that relief should be granted for this catch-22. And, it seems that relief is already possible, if the MSRB will give guidance based upon the following section of the Rule:

Rule G-27(g)(ii) appears to give exemption to a municipal branch office from being named as such (and therefore also an exemption from being designated an OMSJ), if the orders taken or placed by that person are entered through a designated branch office or electronic system that is reviewable at the municipal branch office. Because this is the business model of RBI and many other firms that will be affected by the end of Covid relief, I believe that the exemption should apply and appropriate guidance be given.

Thank you for allowing me the opportunity to remark on this very important and timely subject and I would be happy to discuss the matter further with the MSRB.

Deane Armstrong

H. Deane Armstrong
CCO
Regional Brokers, Inc.