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January 13, 2014

BY ELECTRONIC SUBMISSION

Mr. Ronald W. Smith
Corporate Secretary
Municipal Securities Rulemaking Board
1900 Duke Street, Suite 600
Alexandria, VA 22314

Re: MSRB Regulatory Notice 2013-22 (MSRB Proposes Changes to Continuing Education Program)

Dear Mr. Smith:

MetLife Securities, Inc. appreciates this opportunity to respond to Regulatory Notice 2013-22 issued by the Municipal Securities Rulemaking Board (the "MSRB") in which the MSRB is requesting comment on proposed amendments to Rule G-3 to require all associated persons primarily engaged in municipal securities activities to participate in a minimum of one hour of Firm Element continuing education on municipal securities topics annually. We are requesting clarification of the phrase "primarily engaged in municipal securities activities."

Footnote 6 of the Regulatory Notice states that the "phrase 'primarily engaged in municipal securities activities' is similar to terminology used in MSRB rules to distinguish those individuals who are municipal finance professionals. *See* MSRB Rule G-37(g)(iv)(A)." MSRB Rule G-37(g)(iv)(A) states, in relevant part, as follows:

(iv) The term "municipal finance professional" means:

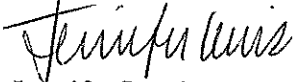
(A) any associated person primarily engaged in municipal securities representative activities, as defined in rule G-3(a)(i), provided, however, that sales activities with natural persons shall not be considered to be municipal securities representative activities for purposes of this subparagraph (A);

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We interpret Footnote 6 to mean that the proposed continuing education requirement would not apply to associated persons that solely engage in selling municipal securities to retail customers. We believe this interpretation is consistent with the MSRB's policy goals for the proposal. We request that the MSRB confirm our understanding.

We would be pleased to discuss this comment in greater detail. If you have any questions, please do not hesitate to contact the undersigned at (617) 578-4228.

Very truly yours,



Jennifer Lewis

cc: ***Municipal Securities Rulemaking Board***
Lynette Kelly, Executive Director
Gary L. Goldsholle, General Counsel
Lawrence P. Sandor, Deputy General Counsel

Enclosure