

**MEMO# 30746**

June 19, 2017

## **ICI Files Comment Letter with FINRA in Response to Special Notice**

[30746]

June 19, 2017 TO: ICI Members  
Investment Company Directors  
ICI Global Members  
Advertising Compliance Advisory Committee  
Broker/Dealer Advisory Committee  
Principal Underwriters Working Group  
SEC Rules Committee  
Small Funds Committee  
Transfer Agent Advisory Committee SUBJECTS: Advertising  
Compliance RE: ICI Files Comment Letter with FINRA in Response to Special Notice

On June 19, 2017, ICI filed the attached comment letter with FINRA, responding to its Special Notice soliciting comment on FINRA's current engagement programs.[\[1\]](#) This request for comments is one of the first steps in FINRA's new initiative to evaluate various aspects of its operations and programs to identify opportunities to more effectively further its mission.

ICI's comment letter supports FINRA's initiative to engage with the regulated fund industry to identify ways to tailor and make more effective its regulatory programs. In summary, (i) we support FINRA conducting retrospective rule reviews and disseminating information to its members through FAQs and Regulatory Notices; and (ii) we recommend improving FINRA's rulemaking process by lengthening the comment period and providing more meaningful responses to comments that identify concerns with FINRA proposals.

Linda M. French  
Assistant General Counsel

[Attachment](#)

**endnotes**

[1] See ICI Memorandum No. 30663, *available at* <https://www.iciglobal.org/iciglobal/pubs/memos/memo30663>.

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