

## COMMENT LETTER

September 12, 2023

# Joint Trades' Comment Letter on Predictive Data Analytics Proposal

On October 10, ICI filed a comment letter with the Securities and Exchange Commission (SEC or "Commission") on its proposal regarding conflicts of interest associated with the use of predictive data analytics (PDA) and other "covered technologies" by broker-dealers and investment advisers ("Proposal"). ICI's letter is attached and is summarized below.

Proposed Rules 15l-2 under the Securities Exchange Act of 1934 ("Exchange Act") applicable to broker-dealers and 211(h)(2)-4 under the Investment Advisers Act of 1940 ("Advisers Act") applicable to registered investment advisers ("Proposed Rules") would require firms to evaluate their use of covered technologies in connection with investor interactions and to eliminate or "neutralize" certain conflicts of interest associated with such use. The Commission also proposes amendments to rules under the Exchange Act and Advisers Act that would require firms to make and maintain certain records in accordance with the Proposed Rules.

Read more in the [comment letter](#).