



June 29, 2017

Honorable Jay Clayton
Chairman
U.S. Securities & Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Re: File No. 265-29: Equity Market Structure Advisory Committee

The Securities Industry and Financial Markets Association (“SIFMA”)¹ submits this letter to the Securities and Exchange Commission (“Commission”) to recommend that the Commission renew the Equity Market Structure Advisory Committee (“EMSAC”). Without a renewal, the EMSAC’s charter will terminate on August 9, 2017.²

The EMSAC has been extremely effective in providing industry perspective and input to the Commission on critical equity market structure issues. In this regard, the EMSAC has developed a number of constructive and actionable recommendations for addressing current issues in equity market structure. Allowing the EMSAC to terminate would unnecessarily disrupt these very productive efforts. Accordingly, SIFMA requests that the Commission renew the EMSAC for a two-year term.

In this additional term, there are a number of topics we would like to see the EMSAC address. Specifically, the EMSAC should address market data, in particular the quality of operation of the Security Information Processors (“SIPs”). Additionally, the EMSAC should revisit NMS Plan governance and evaluate if its July 8, 2016 recommendations³ warrant modification in light of the Self-Regulatory Organizations (“SROs”) continued reliance on the existing governance structure.

We also request that the Commission expand the broker-dealer representation in the EMSAC membership. The EMSAC would benefit greatly from members whose firms trade directly on behalf of retail and institutional investors.

¹ The Securities Industry and Financial Markets Association (SIFMA) brings together the shared interests of hundreds of securities firms, banks and asset managers. SIFMA’s mission is to support a strong financial industry, investor opportunity, capital formation, job creation and economic growth, while building trust and confidence in the financial markets. SIFMA, with offices in New York and Washington, D.C., is the U.S. regional member of the Global Financial Markets Association (GFMA). For more information, visit <http://www.sifma.org>.

² See Securities Exchange Act Release No. 79992 (February 9, 2017), 82 FR 10611 (February 14, 2017).

³ See <https://www.sec.gov/spotlight/emsac/emsac-trading-venues-regulation-subcommittee-recomendation-61016.pdf>

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SIFMA greatly appreciates the Commission's consideration of the issues raised above and would be pleased to discuss these comments in greater detail with the Commission and the Staff. If you have any questions, please contact either me (at 202-962-7383 or tlazo@sifma.org) or Timothy Cummings (at 212-313-1239 or tcummings@sifma.org).

Sincerely,



Theodore R. Lazo
Managing Director and
Associate General Counsel

cc: The Honorable Michael S. Piwowar, Commissioner
The Honorable Kara M. Stein, Commissioner

Gary Goldsholle, Deputy Director, Division of Trading and Markets
David S. Shillman, Associate Director, Division of Trading and Markets