



**Via Electronic Submission**

February 14, 2023

Policy Division, Financial Crimes Enforcement Network  
P.O. Box 39  
Vienna, VA 22183

**RE: Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities, Docket Number FINCEN-2021-0005, RIN 1506-AB49/AB59**

To Whom It May Concern:

The Futures Industry Association (“**FIA**”)<sup>1</sup> submits this letter to the Financial Crimes Enforcement Network (“**FinCEN**”) regarding FinCEN’s proposed rule: Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities (“**Proposed Rule**”).<sup>2</sup> FIA’s members include futures commission merchants (“**FCMs**”) and introducing brokers within the remit of the Commodity Futures Trading Commission. FIA’s membership also includes FCMs dually registered as broker-dealers with the Securities and Exchange Commission. As such, many of FIA’s members are financial institutions for purposes of FinCEN’s regulations and the Proposed Rule. FIA supports FinCEN’s efforts to protect the domestic financial system from abuse. We write today to voice our support for the comments made by the Securities Industry and Financial Markets Association (“**SIFMA**”) in its comment letter filed on February 14, 2023.<sup>3</sup> Adoption of SIFMA’s comments will make the Proposed Rule more useful and cost-effective for our members, who operate in futures and derivatives markets, in addition to the securities markets.

FIA appreciates the opportunity to submit this letter for FinCEN’s consideration. If there are any questions or if you need additional information, please contact Allison Lurton, FIA’s General Counsel and Chief Legal Officer at (202)772-3057 or [alurton@fia.org](mailto:alurton@fia.org).

Respectfully submitted,

A handwritten signature in black ink that reads 'Allison Lurton'.

Allison Lurton  
General Counsel and Chief Legal Officer

<sup>1</sup> FIA is the leading global trade organization for the futures, options, and centrally cleared derivatives markets, with offices in Brussels, London, Singapore and Washington, D.C. FIA’s mission is to support open, transparent and competitive markets; protect and enhance the integrity of the financial system; and promote high standards of professional conduct. FIA’s membership includes clearing firms, exchanges, clearinghouses, trading firms and commodities specialists from about 50 countries, as well as technology vendors, lawyers, and other professionals serving the industry.

<sup>2</sup> Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities, 87 Fed. Reg. 77404 (Dec. 16, 2022).

<sup>3</sup> Letter from Bernard V. Canepa, SIFMA, to FinCEN Re: FinCEN Notice of Proposed Rulemaking on Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities (Docket Number FINCEN-2021-0005, RIN 1506-AB49) (Feb. 14, 2023).