

August 5, 2024

Ronald W. Smith, Corporate Secretary
Municipal Securities Rulemaking Board
1300 I St NW Suite 1000
Washington DC 20005

Dear Mr. Smith,

The Bond Dealers of America (BDA) is pleased to provide comments on MSRB Notice 2024-09, "Request for Comment on Gathering and Display of Bank Dealer Associated Persons' Registration and Qualification Information" (the "Proposal"). BDA is the only DC-based group exclusively representing the interests of securities dealers and banks focused on the US fixed income markets.

The Proposal would require MSRB-registered bank-dealers to begin reporting certain information about firms' Associated Persons, including their names, locations, and licenses/qualifications. This information is already required to be reported by MSRB dealer registrants who are not bank-dealers. BDA generally supports the Proposal. We believe the requirements that would be imposed on bank-dealers would not be overly burdensome and would serve to "level the playing field" between bank-dealers and other dealers.

Both FINRA and federal banking regulators also require bank-dealers affected by the Proposal to report similar information about Associated Persons. As the Board moves towards implementing the Proposal, we ask the MSRB, FINRA, and federal banking regulators to work together to streamline and standardize Associated Person reporting requirements to ease the regulatory burden on affected firms.

We appreciate the opportunity to comment. Please call or write if you have any questions.

Sincerely,



Michael Decker
Senior Vice President