

October 1, 2014

VIA ELECTRONIC MAIL

Ronald W. Smith
Corporate Secretary
Municipal Securities Rulemaking Board
1900 Duke Street, Suite 600
Alexandria, VA 22314

*RE: MSRB Notice 2014-15 August 18, 2014) – Request for Comment on Draft
Amendments to MSRB Rule G-37 to Extend its Provisions to Municipal
Advisors*

Dear Mr. Smith:

On behalf of the Bond Dealers of America (“BDA”), I am pleased to submit this letter in response to Municipal Securities Rulemaking Board (“MSRB”) Notice 2014-15 (“Notice”) seeking comment on amendments to MSRB Rule G-37 (the “Draft Rule”) on political contributions made by dealers and prohibitions on municipal securities business, to extend the rule to cover municipal advisors. BDA is the only DC-based group representing the interests of middle-market securities dealers and banks focused on the U.S. fixed income markets.

BDA Supports MSRB’s Approach. The BDA supports the approach that the MSRB has taken in extending Rule G-37 to municipal advisors. As the BDA has stated since the adoption of the Dodd-Frank Act, we believe that it is important that there is a level playing field between dealers and municipal advisors. We believe the MSRB’s approach in the Draft Rule would provide that level playing field with respect to political contributions and prohibitions on future business.

Potentially Duplicative Regulatory Regime. We note that the approach the MSRB has taken with respect to the Draft Rule may entail unnecessary duplication for dealers. For example, as is the case with some dealers, all of their employees who act as a municipal advisor also serve as bankers in an underwriting capacity. The way the MSRB has written the rule will require these employees to keep dual records and disclosures for the same contributions - contributions they are already required to monitor and disclose. We would therefore suggest to the MSRB that they consider revising the provisions of amended Rule G-37 to permit those employees to maintain one set of records and disclosures.

Thank you for the opportunity to submit these comments on the Draft Rule.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Nicholas".

Michael Nicholas

Chief Executive Officer