Edward Jones

September 13, 2006

Mr. Ernesto A. Lanza Senior Associate General Counsel Municipal Securities Rulemaking Board 1900 Duke Street, Suite 600 Alexandria, VA 22314

RE: MSRB Notice 2006-19, Comment on Application of "Access Equals Delivery" Standard to Official Statement Dissemination For New Issue Municipal Securities

Dear Mr. Lanza:

Edward D. Jones & Co., LP ("Edward Jones," or "the Firm") hereby submits its comment on the above-referenced MSRB Notice, which, in the main, proposes a framework for expanding the Securities and Exchange Commission's "access equals delivery" to the municipal bond market. The Firm appreciates this opportunity to weigh in on an MSRB proposal at this early point of its formation.

As background, Edward Jones is a full-service broker-dealer operating in all 50 States. The Firm is a member of NASD, the New York Stock Exchange and the Chicago Stock Exchange. The Firm services over 6 million customer accounts and estimates that it delivers the official statements on several thousand municipal bond offerings each year.

Edward Jones supports expansion of the S.E.C.'s "access equals delivery" model to the municipal bond market. Customers and syndicate participants alike would benefit from required disclosures being made accessible via a free, electronic storage site. To that end, the Firm believes that the required electronic format should meet or exceed the parameters for "PDF" (so that the OS could be forwarded as an e-mail attachment). Additionally, the Firm believes that any modification to Rule G-32 to conform MSRB Rules to the customer notice provision of S.E.C. Rule 173 should permit confirmation disclosure as a means of satisfying both the timing and notice requirements.

In sum, the Firm expresses its unqualified support for MSRB's proposed adoption of the S.E.C. "access equals delivery" model. Edward Jones thanks the MSRB for its consideration of this Comment. If the MSRB requires additional information, please contact the undersigned at (314) 515-3140

Sincerely,

Robert Beck

Principal

Municipal Bonds