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NABL Submits Issue Price Comments.

NABL has filed its comments on the arbitrage regulations proposed on June 24, 2015. NABL requested several items, including:

- (1) confirmation that an issuer need not choose between the general method and the alternative method prior to the issue date;
- (2) confirmation that, under the alternative method, the issuer's obligation is limited to obtaining a covenant from the sole or lead underwriter;
- (3) clarification that the issuer's due diligence obligation with respect to issue price is that of a prudent person;
- (4) elimination of the uncertainty in the definition of "underwriter;"
- (5) additional alternative methods for determining issue price for bonds sold pursuant to a competitive bid;(6) confirmation that bonds purchased directly from an issuer by a bank or another party for its own investment would fall under the general private placement and buyer rules of Section 1273 of the Code; and
- (7) addition of a cross-reference to the definition of "issue price" for other similar concepts in the tax code.

NABL also requested to testify at the hearing on the proposed regulations to be held on October 28, 2015.

Click here to read NABL's comments.

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