
BDA Submits Comment Letter: MSRB Second Request for Comment on Draft Amendments to and Clarifications of MSRB Rule G-34, on Obtaining CUSIP Numbers.

The BDA submitted a comment letter to the MSRB in response to their second request for comment seeking industry input on draft rule amendments to MSRB Rule G-34, on CUSIP numbers, new issue, and market information requirements. You can find our final comment letter here.

BDA's comment letter addresses the following:

- Expresses support for the changes the MSRB made from the original request for comment
- Requests clarifications exempting direct purchases by banks from the CUSIP and depository eligibility requirements
- Requests a clarification where direct purchase transactions are not purchased by banks but instead by their non-bank affiliates
- Suggests that the MSRB should not refer specifically to CUSIP but to any identification number widely accepted in the municipal securities market

Background on updated proposed amendments:

- Provides a limited exception to the requirement to obtain CUSIP numbers, and to apply for depository eligibility, in the case of a direct purchase of municipal securities by a bank, affiliated banks or a consortium of banks formed for the purpose of participating in the direct purchase.
- Amends the definition of "underwriter" in Rule G-34(a) to cross reference to the definition of "underwriter" set forth in Exchange Act Rule 15c2-12(f)(8) and requires all municipal advisors to obtain CUSIP numbers when advising an issuer in a competitive new issue transaction in municipal securities.
- Requires all municipal advisors to obtain CUSIP numbers when advising an issuer in a competitive new issue transaction in municipal securities, however, the MSRB seeks comment on draft proposed exceptions from each of these requirements in certain limited circumstances.
- The MSRB proposes to make the application of the draft rule amendments set forth in this second request for comment prospective.

You can find BDA's letter to the MSRB for the original proposed amendments here.

Bond Dealers of America

June 29, 2017

Copyright © 2026 Bond Case Briefs | bondcasebriefs.com