

# **Bond Case Briefs**

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## **BDA Submits Comment Letter to IRS on Issue Price to Inform 2015-16 IRS Priority Guidance.**

The Bond Dealers of America submitted a [comment letter to IRS](#) in response to its request for comment on the 2015-2016 IRS Priority Guidance Plan. The purpose of BDA's letter is to reaffirm BDA's concerns with IRS's [proposed rule changes](#) related to issue price if IRS chooses to move forward on the proposed rule changes in 2015-16.

The letter reaffirms BDA's previously stated concerns with the rule's elimination of the "reasonable expectations" standard, the unworkable nature of the general rule, and the overly burdensome "safe harbor," which would require 25 percent of an issuance to be sold in order to establish issue price.

BDA's December 2013 comment letter on proposed issue price rule amendments can be read [here](#).

BDA's August 2010 joint trade association guidance letter on issue price can be read [here](#).

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