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BDA Submits Comment Letter to MSRB on Long-Term Strategic Priorities.

On November 10, 2016, BDA submitted a <u>comment letter</u> to the MSRB on its request for comment on its long-term priorities and initiatives related to its core activities and goals to promote a fair and efficient municipal market. You can view MSRB's request for comment <u>here</u>.

MSRB requested feedback from market stakeholders on areas where it should focus its strategic priorities and how it should prioritize its core activities. BDA's letter recommends that MSRB:

- After many years of significant regulatory change, focus on ways to improve the municipal securities market that do not involve sweeping and burdensome new rules
- Enhance EMMA to allow for users to search by issuer and not be a primarily CUSIP-based system
- Harmonize the requirements of Rule G-15 with the recently adopted changes to SEC Rule 10b-10
- Conduct a study to consider how the cumulative regulatory changes over the past five years have resulted in increased costs, burdens, and inefficiencies, and suggest changes it would recommend as a result of the study
- Increase issuer education efforts
- Encourage the voluntary filing of bank loan information by recognizing and mitigating disclosure liability concerns

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