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February 28, 2008

Cristeena G. Naser Senior Counsel Center for Securities, Trust & Investments

Phone: 202-663-5332 Fax: 202-828-4548 Email: <u>cnaser@aba.com</u> Ernesto A. Lanza Senior Associate General Counsel Municipal Securities Rulemaking Board 1900 Duke Street, Suite 600 Alexandria, VA 22314

Re:

MSRB Notice 2008-05 - Continuing Disclosure Component of the New Electronic Municipal Market Access System (EMMA)

January 31, 2008

Dear Mr. Lanza:

The American Bankers Association<sup>1</sup> ("ABA"), on behalf of its Corporate Trust Committee, is responding to the request for comment by the Municipal Securities Rulemaking Board ("MSRB") on the continuing disclosure component of its Electronic Municipal Market Access System, also known as "EMMA." ABA's Corporate Trust Committee is comprised of regional and nationwide corporate trustees who provide the vast majority of corporate trust services offered in the United States.

ABA supports the MSRB's initiative to enhance the availability of disclosure documents in the secondary market for municipal securities through the continuing disclosure component of EMMA. We stand ready to continue to assist issuers of municipal securities fulfill their secondary market disclosure obligations.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Cristeena G. Naser

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<sup>&</sup>lt;sup>1</sup> The American Bankers Association brings together banks of all sizes and charters into one association. ABA works to enhance the competitiveness of the nation's banking industry and strengthen America's economy and communities. Its members represent over 95 percent of the industry's \$12.7 trillion in assets and employ over 2 million men and women.