

# Comment on Notice 2015-16

from Chris Melton,

on Friday, October 30, 2015

Comment:

Thank you for permitting me to comment on the proposed amendments to Rule G-15 related to confirmation disclosure. The current draft is a considerable improvement over the original proposal, particularly in the area of the time period for which trades are subject to the new requirement.

Reducing the turn-around time covered by the Rule to two hours will considerably increase the availability of reasonably priced bonds to retail clients and reduce the anti-competitive nature of the requirement. It is likely that some dealers will make bonds unavailable to retail during the time period when mark up disclosure is required. Reducing that time will provide retail clients with a better opportunity to buy the most reasonably priced securities: the cheapest bonds are generally the first out of the door. Reducing the time period subject to the requirement should also reduce the programming necessary for small firms to track the trades subject to the Rule, reducing the anti-competitive nature of the requirement.

Changing the disclosure requirement to mark up also clarified the nature of what is to be disclosed, although there are still any number of scenarios, which neither time nor inclination would result in discussion here, which will require further interpretation by MSRB staff. Additionally, while the requirement to add EMMA information is an improvement, certain logistical matters should be settled before requiring a direct link to CUSIP information. It may be better to provide the link to the EMMA home page for the time being.

Thank you for listening to many of the industry's concerns on this matter.