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April 4, 2007

Ernesto A. Lanza, Esq.
Senior Associate General Counsel
Municipal Securities Rulemaking Board
1900 Duke Street, Suite 600
Alexandria, Virginia 22314

Re: Comments on MSRB 2007-10

Dear Mr. Lanza:

This letter is in response to the Board's request for comments on proposed rule changes to improve transaction reporting of new issue municipal securities.

The **centralization** of an electronic system for new issue trade processing is a change that the industry has been eager for implementation. One of the biggest problems in the municipal industry is the amount of paperwork that is associated with a new issue underwriting and getting this paperwork completed and disseminated on a timely manner. This proposal would alleviate the duplication of information that is sent to numerous vendors and would cut down on the time needed to process new issues.

Complying with the proposal to use the New Issue Information Dissemination System (NIIDS) should not be a hardship to implement and will make the dissemination of the information more uniform. Another important benefit would be the ability to efficiently control information. We have had instances where one vendor received incorrect information from an outside source. With one central location for information, the underwriter can control what information would be released to the public and alleviate any miscommunication.

In the past, some CUSIP numbers have not been requested prior to the "final award" because the structure of the issue may change. If CUSIP numbers are requested for each maturity and then the issue is structured with a term(s), the underwriter is still responsible for the cost of all CUSIP'S that were requested, not just the one that was used. This is a cost that the underwriter either absorbs or is passed on to the issuer. We have no problem

in requesting CUSIP'S earlier for a new issue; however, it may result in higher cost for the issuer or underwriter.

Thank you for allowing me to provide comments to the Board regarding this proposal.

Sincerely,

A handwritten signature in black ink that reads "Lu Ann Vargo". The signature is written in a cursive, flowing style.

Lu Ann Vargo
Senior Vice President
Municipal Trader/Underwriter