

KISTA
325 West Main Street
Suite 300
Lexington, KY 40507

September 27, 2010

Ms. Leslie Carey
Associate General Counsel
Municipal Securities Rulemaking Board

RE: Proposed Rule G-23 on the Underwriting Activities of Financial Advisors

Dear Ms. Carey:

In July of this year, KISTA [Kentucky Interlocal School Transportation Association] issued \$2,235,000 Certificates of Participation [COP]. The COP's allowed us to lease new school buses to our member districts to provide them a quality and safe transportation experience. The winning bid came from Ross, Sinclair & Associates, LLC [RSA] at a market Net Interest Cost of 2.795%, which was **1.942% less than the next closest bid.**

RSA is also the Financial Advisor for the District. Had RSA not bid on these COP's, KISTA would not have been able to secure favorable financing terms for the member districts. The School Districts in Kentucky have severe budgetary issues and we must do everything within our control to provide them with the best financing opportunities possible.

I urge you to not pursue the passage of Rule G-23. It will have a defining negative impact on School District's throughout the Commonwealth of Kentucky.

Sincerely,

KISTA:
Kentucky Interlocal School Transportation
Association, a Kentucky Interlocal Cooperative
Formed pursuant to KRS 56.210 through 65.300


Jack Moreland
President