

Comment on Notice 2019-13

from Stan Kramer, First Kentucky Securities Corp.

on Tuesday, August 13, 2019

Comment:

Financial Advisors that are also broker Dealers ought to have the right to bid on competitive issues as long as the sale has been advertised on national platforms, (ie; IPREO, Bloomberg, state sponsored calendars). This is important, especially to small issuers whose offerings have limited appeal due to the issue size. The FA is the entity with the most knowledge about the issuer and would probably produce a better bid for their client under many circumstances.