

NATIONAL FEDERATION OF MUNICIPAL ANALYSTS

Constituent
Societies

September 15, 2006

Boston
Municipal
Analysts
Forum

Mr. Ernesto A. Lanza

California
Society of
Municipal
Analysts

**Senior Associate General Counsel
Municipal Securities Rulemaking Board
1900 Duke Street, Suite 600
Alexandria, Virginia 22314**

Chicago
Municipal
Analysts
Society

**RE: MSRB Notice 2006-19: Request for Comment on: Application of
"Access Equals Delivery" Standard to Official Statement
Dissemination for New Issue Municipal Securities**

Minnesota
Society of
Municipal
Analysts

Municipal
Analysts
Group of
New York

Dear Mr. Lanza:

Southern
Municipal
Finance
Society

The National Federation of Municipal Analysts ("NFMA") is an association comprised of nearly 1,000 municipal credit analysts and portfolio managers across the country. NFMA is also a member of the Muni Council, an informal group of 18 organizations representing all market constituencies of the municipal bond industry.

NFMA appreciates this opportunity to comment on the feasibility of a central repository in connection with proposals of the Municipal Securities Rulemaking Board ("MSRB"), Notice 2006-19, issued on July 27, 2006 (the "Notice"). The Notice discusses possible application of the "access equals delivery" standard for the delivery obligations under MSRB Rules G-32 and G-36, which would be modeled on Securities and Exchange Commission ("SEC") reforms of prospectus delivery obligations for registered offerings.

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The SEC's final rule on securities offering reform stated that the premise for allowing the "access equals delivery" standard for document dissemination is that investors are presumed to have access to the Internet. The primary criterion for allowing the new standard is that documents, which would otherwise be delivered by underwriters, are "readily available" on the SEC's Internet site, EDGAR.

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We commend the MSRB's initiative in promoting a comparable "access equals delivery" standard for the dissemination of primary market offering materials for municipal securities. We believe the SEC's premise that investors have access to the Internet applies equally in the municipal securities market and the registered securities market.

We are also of the view that making primary market offering documents readily available, free of charge, to investors will improve the dissemination of information by making the document available to a wider audience than just purchasing customers of broker-dealers and that overall market efficiency will be promoted.

The development of electronic dissemination of municipal securities disclosure information in the past several years has vastly improved the quality of information flows to investors and the marketplace generally. We fully endorse continued promotion of electronic media by the MSRB.

The Notice refers to three possible sites that could provide access to the final official statements: (i) a central directory of final official statements indicating the location of the host site where the final official statement is actually located (e.g. websites maintained by the issuer, financial advisor, underwriter, a vendor etc.), (ii) a centralized Internet website created to be a single location for access to final official statements, or (iii) the MSRB itself.

In our opinion there should be a single central location for the final official statements, either a central Internet website or the MSRB. We do not believe a central directory satisfies the "readily available" criterion. An investor should not have to go to one site to find the site where the document is located and then be required to search the second site for the final official statement. The decentralized sites will vary considerably in their search characteristics and may or may not be friendly to the user.

The central location should permit the use of CUSIP numbers as an identifier for locating final official statements. In addition, to meet the "readily available" standard, an investor should be able to find the final official statement by entering the name of the issuer, the name of the obligor (if applicable), the title of the bonds, the state of issuance, the name of the underwriter or other identifiers that would be user friendly. As stated in the Notice, access to final official statements should be free of charge.

The central location should also have features important to the person filing the final official statement. These should include a "return receipt" and the ability for the filer to review the document for accuracy before the document is released to the public. If it is necessary to file an amendment ("sticker") or an addendum, there should be a means to tag the document indicating the final official statement to which it relates, preferably with a hyperlink to the original final official statement.

The central repository should provide access to final official statements beyond the new issue disclosure period of 25 days after the closing date. There should be an archive making final official statements available for the life of the bonds because final official statements retain their importance until final maturity. Redemption provisions, issuer covenants, additional bond tests, refunding options, document summaries, etc., retain their materiality beyond the fiscal year in which the bonds are being issued. The central repository should be more than a means for broker-dealers to meet their Rule G-32 delivery requirement by allowing investors continued access to important information during the secondary market period. We note that EDGAR has archives for primary market materials.

We look forward to ongoing opportunities to share our thoughts with the MSRB about the features that the central hosting site should offer, and may be in a position to offer our

views as to the best hosting site once the MSRB has set forth the criteria that the hosting site must meet.

Please do not hesitate to contact the undersigned at 212-339-3544 or via email at efriedland@fsa.com with any questions that you might have.

Very truly yours,

/s/Eric Friedland

Eric Friedland
Chairman
NFMA