



ECHO VALLEY ADVISORS, LLC

104 E Cedar St, Livingston NJ 07039

973-736-4882



February 23, 2024

Mr. Ronald W. Smith
Corporate Secretary
Municipal Securities Rulemaking Board
1300 I Street NW, Suite 1000
Washington, DC 20005

Re: MSRB Request for Information 2023-11 on Impacts of MSRB Rules on Small Firms

Dear Mr. Smith,

Thank you for giving small firms the opportunity to provide feedback on the MSRB's regulatory process and its impact on small firms.

What factors make a regulated entity a small, mid-sized or large regulated entity?

The most important factor is number of employees. Many regulated activities require effort proportional to the number of employees (e.g. tracking communications, developing a training plan and supervising its implementation, and certifying gift-giving and political donations). The next most important factor is the number of transactions. Regardless of size, every transaction needs to be documented appropriately (e.g. G-42 letter, contract, analysis, transaction documents, invoice, and recommendations). The least important factor is revenue.

With respect to the other questions, since my firm has been in business for less than one year and has not yet been audited, I will not provide responses at this time.

In addition to this formal and public forum, I have two suggestions for additional ways in which the MSRB could engage with small firms:

- 1) Host an in-person gathering or a series of regional in-person gatherings for small firms. The virtual compliance outreach that took place on December 7th was useful, but an in-person event would allow more robust discussion to take place between municipal advisors and the MSRB, and also amongst the municipal advisors.
- 2) Create an additional phone line (or some other mechanism) which would allow municipal advisors to ask compliance questions anonymously.

Best regards,

Julie Needham, President
Echo Valley Advisors, LLC