

SUBMITTED ELECTRONICALLY AT MSRB.ORG

April 11, 2025

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

Re: Response to MSRB Notice 2024-15 – *Concept Release: MSRB Requests Comment on Potential Modernization of Municipal Fund Securities Disclosure Obligations*

Dear Mr. Smith:

Commonwealth Savers Plan (f/k/a Virginia College Savings Plan) is the nation's largest 529 plan, with over three million accounts and over \$100 billion in assets under management as of February 28, 2025. Since 1994, we have striven to provide affordable, flexible and tax-advantaged college savings programs for our customers. We presently sponsor four such programs: Invest529sm, CollegeAmerica[®], Prepaid529sm and CollegeWealth[®] (Prepaid529 and CollegeWealth are now closed to new accounts). We also sponsor two ABLÉ programs, ABLEnowsm and ABLEAmerica[®] and administer RetirePath Virginiasm, a program for certain private sector Virginia employees who do not have access to a retirement plan at work.

Commonwealth Savers Plan (CSP) appreciates the MSRB's continuing commitment to our industry and thanks it for the opportunity to provide a comment to Notice 2024-15. CSP supports the positions expressed in both the College Savings Plans Network and the College Savings Foundation's responses to the Notice. Please do not hesitate to contact us with any questions or for more information. You may reach us by calling Chris McGee (804) 225-2681 or Leslie Crudele (804) 371-0583.

Sincerely,



Mary G. Morris
CEO