

# Associated Bond Brokers, Inc.

---

3232 McKinney Avenue, Suite 690  
Dallas, Texas 75204  
(214) 922-9300

November 10, 2010

Ms. Peg Henry  
Deputy General Counsel  
Municipal Securities Rulemaking Board  
1900 Duke St, Suite 600  
Alexandria, VA 22314

**Re: *MSRB Notice 2010-35: Request for Comment on MSRB Guidance on  
Municipal Securities Brokers Brokers***

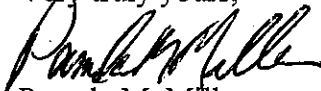
Dear Ms. Henry:

Associated Bond Brokers, Inc ("ABBI") appreciates the opportunity to respond to the notice regarding guidance for Municipal Securities Brokers Brokers ("MSBB's"). You have, or will be, receiving a response to the proposed guidance from the Securities and Financial Markets Association ("SIFMA") on behalf of the MSBB committee of SIFMA of which we are a member.

The SIFMA response is a result of multiple meetings and conference calls between MSBB committee members and representatives of SIFMA and represents the consensus view of the committee members. We are in agreement with the bulk of the response as to the role of MSBB's in the marketplace and especially the part of the response as it relates to the application of rule G-18 to MSBB's.

ABBI operates exclusively as a MSBB and deals only with registered broker dealers or dealer banks. Our business model does not include the ability to execute with SMMP's or Institutional clients. We hope that MSRB will carefully consider the points enumerated in the SIFMA response before acting on the proposed guidance.

Very truly yours,



Pamela M. Miller  
President