



June 4, 2010

Ernesto Lanza
General Counsel
Municipal Securities Rulemaking Board
1900 Duke Street
Suite 600
Alexandria, VA 22314

Re: MSRB Notice 2010-10 Request for Comments on Draft Interpretive Guidance on Prevailing Market Prices and Mark-Ups for Transactions in Municipal Securities

Dear Mr. Lanza:

Members of and participants in the municipal bond industry sincerely appreciate the opportunity to provide comments, as requested, on proposals and draft proposals established by the Municipal Securities Rulemaking Board ("MSRB"), especially knowing that our input is valued and given weight before final decisions are made by the Board.

As a member of the Municipal Executive Committee of the Securities Industry and Financial Markets Association ("SIFMA") I have taken part in SIFMA's response to the MSRB concerning the above referenced Notice. J.J.B. Hilliard, W.L. Lyons, LLC ("Hilliard Lyons") concurs with the content of SIFMA's response in all matters contained therein.

The balance of this letter will deal with the specific impact the proposed guidance will have upon Hilliard Lyons and other small to mid sized regional retail firms.

The Guidance Dictates How a Firm Should Commit its Capital

Regardless of the intent of the guidance, the result is the establishment of directions as to how a firm must set prices when risking its capital. When a retail firm bids on an odd lot list or several block size bids wanted it does so with the expectation that its representatives will place the bonds with their investors. From a retail perspective, this may take from several days up to two weeks. The position is exposed to market risk, among other risks, during this time frame. Yield and spread are factored into the bid level to create a cushion against market decline. Other trading activity in the bond, if available at all, is one consideration used in determining a reoffering level



but it is not the only factor. To 'look back' over the period a bond is held and state that since the market did not decline during that time frame and there was no risk is the opinion of someone who has never committed capital, taken risk, or sat on a trading desk during volatile market conditions. Risk is very real and so are the losses taken when markets fall. Hindsight is no way to judge trading behavior. "Past performance is no guarantee of future results."

The Hierarchy for Determining Prevailing Market Price is Schooling

The steps set forth for determining prevailing market price offends and confuses municipal market professionals who have been providing not only funding for issuers for decades but who have also provided liquidity to investors and institutions throughout their careers. The directives are tantamount to a group of traders and underwriters opining upon how Political Science should be taught at the university level so that every college or university student would receive the same, identical education on the topic whether they attend an Ivy League school or a local community college.

When I began my municipal bond career I sat alongside the fellow I was replacing. He was 83 years old and had sold municipals during the depression years of the late 20s and early 30s. I will never forget one particular lesson. He said that the municipal bond market was composed of gentlemen. Trades are done on a person's word. Integrity is everything and that once your reputation is tarnished you might as well pack it in. Today, nearly 40 years since that lecture, I continue to find his statements pertinent and true. Traders are challenged to balance what is best for their clients and their firm. What develops from the process is a fair and balanced market. Unfortunately a few bad apples can spoil things for the industry, but there are existing rules that should be enforced to deal with such firms. Recent offenses in the financial markets have occurred outside of the municipal bond product arena which has resulted in a "knee jerk" reaction to place heavy restrictions on municipal trading.

How is this relevant to the guidance? I can speak for Hilliard Lyons and how it establishes market levels for secondary trading. First off, most firms subscribe to and use as a guide, scales produced by nationally recognized providers such as the MMA and MMD daily scales. Market professional know how particular bonds trade in relationship to the scales. Regional firms typically bid on anywhere from 3-10 new municipal issues on a weekly basis. Most deals are schools, G.O.s, water and sewer revenues, or issues from a local state agency that would most likely be negotiated. The new issue levels are used as contemporaneous trade levels when establishing prices for secondary trades.

The size of a trade is absolutely relevant when establishing the reoffering level and concession on a secondary trade. The average municipal bond trade at Hilliard Lyons has averaged \$20,000-\$25,000 for many years. To average this small amount there are many trades at the \$5,000 and \$10,000 level. Levels on odd lots are typically



modestly higher than round lots in order to entice buyers for small lot trades. Spreads are also wider so that representatives, that make their livings based upon product placement, will allocate time to such placements. To suggest that the offering level on an odd lot transaction should mirror that of a round lot trade is uninformed and not practical or realistic.

At Hilliard Lyons, our traders reference MSRB trade data as one resource when bidding bonds. Our intention is to make certain that our trading levels falls within the range of recent trades and that our bid and offering levels are fair and reasonable. If there is a major difference of opinion between a trader and recent trade reporting our practice is to give the bonds to a Broker's Broker for street bids while reserving the right to bid the bonds 'in comp'.

There Will be a Negative Impact on Retail Liquidity

Regional firms with a local retail focus can see many internal bids wanted lists a day containing as many as 50 items. To step through the waterfall as detailed in the guidance is an onerous requirement that would consume far too much time to make the process efficient and would lessen liquidity for retail investors. The Board must realize that traders in regional firms wear many hats. Bidding is only one job responsibility. On a typical day our desk employees are involved in underwriting, trading, marketing, compliance, reporting, problem solving, portfolio structuring, filing, research, continuing education, serving on firm committees and speaking to representatives and their clients. Smaller retail firms do not have the resources that larger firms have, causing staff at these firms to have many desk responsibilities.

Recordkeeping Requirements Are Impractical For Smaller Firms

Not all firms have the technology owned by the larger firms whereby trading notes and bid documentation can be made electronically. Paper documentation is still the only method used by my firm. Not only does this procedure use a lot of paper, but makes filing, storage and auditing cumbersome. Still, we have print documentation that we have reviewed trade history and continuing disclosure which is used to inform representatives and clients of material events relevant to the trade.

Values Placed on Bonds are Based Upon a Trader's Experienced Opinion

On any given day and moment what traders are willing to pay for bond could vary depending upon a variety of factors. The size of current inventory, capital available at that point in time, where they think the market is headed, the size of the lot, the coupon, rating and maturity, perceived demand from their sales force and the time frame they think will be needed to place the bond with investors are just a few examples that affect the trade's opinion. Please refer to attachment "A" which is a real



life example of a bid list and the bidding results. The list was provided by a broker and is being used with permission.

Please refer to item #1. In the far right hand column there is a listing of the "Rank" of each bidder in order from highest to lowest. Under the first column entitled "Bid" is the actual bid in the format submitted by the bidder. The next column converts basis less concession bid to dollar prices while the next column shows the difference between each bid and the highest bid. While the Board would only see the price at which the bond traded as reported by the dealer, the additional information provided illustrates the differences of opinion traders had for this block of bonds, that being 2.5 points or 250 basis points from high to low. That disparity becomes more apparent in items #4, 56 and 7 where the spreads between high and low exceed 6 points. The spread on item #17 is nearly 18 points. Please keep in mind that the levels shown are the levels at which the various traders were willing to commit their firm's capital.

Now, which of the prices for any item is the correct price? Is it the high price? Perhaps, but it may also very well be the 3rd or 4th price. The high bidder may lose money on the bond or the buyer may pay too much. The disparity exists because the municipal bond market, unlike the much smaller corporate bond market, has over 1.2 million distinct CUSIP numbers while the corresponding number of reporting CUSIPs in the domestic corporate market, according to the Trace Fact Book, is 54,141. It is considerably more difficult to find a similar municipal bond than to find a similar corporate bond. Regional dealers follow the bonds within their marketing footprint and have a more intimate knowledge of their markets than someone trading on a national basis. This alone can account for a wide range of opinions as to a bond's worth. Throw in the tax exemption at the state level for some municipals and not others and the difficulty level rises.

Regional Retail Dealers May Be Considered Market Makers

The past five years has seen a consolidation of broker dealers. According to a May 30, 2010 article in *Investment News* there are 8.2% fewer firms in the business than there were just five years ago. Economic conditions and regulatory pressure are noted as reasons small firms have gone out of business. With them has gone liquidity provided to their retail investors in municipal bonds. Hilliard Lyons exited the Over the Counter market when spreads, having been reduced to a penny, made it impossible to generate a profit.

Dealers willing to risk capital in order to provide liquidity to retail investors in any size lot should be permitted to consider the price they are willing to pay for a bond as its contemporaneous cost. It may be fair to consider a regional, retail firm like Hilliard Lyons as a market maker in municipal bonds within its firm's footprint. After all, that is where our client base lives and they wish to invest in bonds issued by their local communities and states.



When firms are discouraged from committing capital in order to support the liquidity for the municipal market, the potential for poorer pricing for clients becomes a reality. If traders decide it is better to solicit bids through a broker rather than submitting their own bids for a client, two more layers of expense are subtracted from the client's proceeds. One fee is charged by the broker and the other by the bidding firm on the other side. These reductions are in addition to the fee charged by the firm soliciting bids on behalf of the client. It is obvious what is best for the client.

Conclusion

There has been much talk about the municipal bond market being opaque. This may have been true 10 years ago, but with the real time reporting of trades and the introduction of MSRB's EMMA site, disclosure and price transparency have never been better. With the information available for traders and regulators alike, no additional guidance on a "how to" basis is necessary. The "If it isn't broken, break it" approach can only decrease liquidity, force more firms from the market and negatively impact retail investors.

Respectfully,

Ronald J. Dieckman
Director, Municipal Bonds
J.J.B. Hilliard, W.L. Lyons, LLC

500m OH LIBERTY OH LOC SCH DIST IMPT REF B/Q
N/C G.O. OY 3.750 B/E CIFG

5.000
DD 03/30/06

12/01/13

TRADED
FC 06/01/06

CIFG

1

#531150DP2

| Bid | Price |
|------------|-----------|
| 108.262 | \$108.262 |
| 2.50-0.855 | \$107.428 |
| 2.75-1.175 | \$106.244 |
| 2.90-1.135 | \$105.769 |

| Delta |
|-------|
| 0.834 |
| 2.018 |
| 2.493 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |

Total Bids : 4

230m OH HARRISON OH REF B/Q N/C PUB IMPT G.O.
OY 3.530 B/E AGM UND: Aa3/

4.750
DD 08/01/05

12/01/13

TRADED
FC 12/01/05

AGM

2

#415422DU5

| Bid | Price |
|------------|-----------|
| 1.55-0.369 | \$110.432 |
| 109.675 | \$109.675 |
| 1.80-0.725 | \$109.184 |
| 1.75-1.425 | \$108.661 |
| 108.625 | \$108.625 |
| 2.5-0.645 | \$106.810 |
| PASS | |

| Delta |
|-------|
| 0.757 |
| 1.248 |
| 1.771 |
| 1.807 |
| 3.622 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |
| 6 |
| Pass |

Total Bids : 6

280m OH NAPOLEON OH CITY SCH DIST REF B/Q N/C
G.O. OY 3.640 B/E AMBAC

5.000
DD 03/23/05

12/01/14

TRADED
FC 06/01/05

AMBAC

3

#630684DM7

| Bid | Price |
|------------|-----------|
| 2.50-0.915 | \$109.619 |
| 2.70-0.775 | \$108.869 |
| 108.489 | \$108.489 |
| 2.75-1.275 | \$108.148 |
| 105.925 | \$105.925 |

| Delta |
|-------|
| 0.750 |
| 1.130 |
| 1.471 |
| 3.694 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |

Total Bids : 5

225m OH HUDSON CITY OH VAR PURP B/Q N/C PUB
IMPT G.O. OY 3.660 B/E UND: Aaa/

5.000
DD 05/26/05

12/01/14

TRADED
FC 06/01/06

Aaa /NR

4

#443695HP9

| Bid | Price |
|------------|-----------|
| 1.9-0.625 | \$112.629 |
| 112.575 | \$112.575 |
| 112.437 | \$112.437 |
| 1.90-0.835 | \$112.419 |
| 2.00-1.025 | \$111.770 |
| 105.665 | \$105.665 |
| PASS | |

| Delta |
|-------|
| 0.054 |
| 0.192 |
| 0.210 |
| 0.859 |
| 6.964 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |
| 6 |
| Pass |

Total Bids : 6

65m NJ NJ ST TRANSN TR FD AUTH REV MASS/RAPID
TRAN OY 4.240 B/E AGM UND: Aa3/AA-

5.000
DD 10/27/05

06/15/20

TRADED
FC 12/15/05

AGM

5

#646136CG4

| Bid | Price |
|------------|-----------|
| 3.50-0.920 | \$105.929 |
| 3.75-1.330 | \$104.340 |
| 103.100 | \$103.100 |
| 102.750 | \$102.750 |
| 4.00-2.450 | \$102.056 |
| 99.300 | \$99.300 |
| PASS | |

| Delta |
|---------|
| 15@100; |
| 1.589 |
| 2.829 |
| 3.179 |
| 3.873 |
| 6.629 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |
| 6 |
| Pass |

Total Bids : 6

Attachment 'A'

25m NJ NJ ST TRANSN TR FD AUTH SYS N/C 5.250 12/15/20 11:00
 MASS/RAPID TRAN OY 4.390 B/E AGM UND: DD 06/01/06 FC 12/15/06
 Aa3/AA- AGM
 #646136DZ1

| Bid | Price | Delta | Rank |
|------------|-----------|-------|------|
| 108.750 | \$108.750 | | 1 |
| 108.150 | \$108.150 | 0.600 | 2 |
| 4.00-2.700 | \$107.946 | 0.804 | 3 |
| 4.15-1.990 | \$107.308 | 1.442 | 4 |
| 4.40-1.700 | \$105.395 | 3.355 | 5 |
| 104.860 | \$104.860 | 3.890 | 6 |
| 4.90-1.200 | \$101.649 | 7.101 | 7 |

Total Bids : 7

20m NJ NJ ST TRANSN TR FD AUTH SYS N/C 5.500 12/15/21 11:00
 MASS/RAPID TRAN OY 4.560 B/E SAGM UND: DD 06/01/06 FC 12/15/06
 Aa3/AA- SAGM
 #646136NL1

| Bid | Price | Delta | Rank |
|------------|-----------|-------|------|
| 4.00-2.950 | \$110.786 | | 1 |
| 109.900 | \$109.900 | 0.886 | 2 |
| 4.25-2.550 | \$108.741 | 2.045 | 3 |
| 108.250 | \$108.250 | 2.536 | 4 |
| 4.50-2.050 | \$106.861 | 3.925 | 5 |
| 5-1.450 | \$102.887 | 7.899 | 6 |

Total Bids : 6

15m PA PHILADELPHIA PA AUTH FOR INDL DEV ARPT 5.250 07/01/28 TRADED
 REV AMT *AMT* OID 5.440 SYS B/E NATL DD 07/10/01 FC 01/01/02
 UND: A2/A+ NATL
 #71781ECZ6 [SNK 07/23]

| Bid | Price | Delta | Rank |
|-------------|----------|-------|------|
| 5.377-0.750 | \$97.789 | | 1 |
| 95.850 | \$95.850 | 1.939 | 2 |
| 5.40-2.550 | \$95.729 | 2.060 | 3 |
| 95.550 | \$95.550 | 2.239 | 4 |
| 5.677-0.750 | \$94.460 | 3.329 | 5 |
| 93.510 | \$93.510 | 4.279 | 6 |
| PASS | | | Pass |

Total Bids : 6

150m NJ NJ ECON DEV AUTH REV SCH FACS CONSTR 4.375 09/01/29 11:00
 OID 4.500 B/E AMBAC UND: Aa3/AA- DD 01/15/04 FC 09/01/04
 AMBAC
 #645916XK8 [SNK 09/28]

| Bid | Price | Delta | Rank |
|------------|----------|-------|------|
| 98.375 | \$98.375 | | 1 |
| 97.985 | \$97.985 | 0.390 | 2 |
| 96.755 | \$96.755 | 1.620 | 3 |
| 4.50-2.325 | \$96.071 | 2.304 | 4 |
| 4.60-1.365 | \$95.777 | 2.598 | 5 |
| 95.485 | \$95.485 | 2.890 | 6 |
| 94.375 | \$94.375 | 4.000 | 7 |
| 94.125 | \$94.125 | 4.250 | 8 |

Total Bids : 8

40m VA VA ST PUB SCH AUTH FINANCE N/C OY 3.740 5.000 08/01/13 11:30
 B/E UND: Aa1/ DD 11/01/06 FC 08/01/07
 Aa1 /AA+

| Bid | Price | Delta | Rank |
|-------------|-----------|-------|------|
| 1.600-0.970 | \$109.423 | | 1 |
| 1.70-0.840 | \$109.229 | 0.194 | 2 |
| 109.050 | \$109.050 | 0.373 | 3 |
| 1.50-1.750 | \$108.968 | 0.455 | 4 |
| 108.750 | \$108.750 | 0.673 | 5 |
| 2.00-1.450 | \$107.654 | 1.769 | 6 |
| 106.640 | \$106.640 | 2.783 | 7 |

3.2-1.200 \$104.144

5.2/9

8

Total Bids : 8

350m NY NY ST PWR AUTH REV N/C PPS OY 3.670 B/E
FGIC UND: Aa2/AA-

5.000
DD 01/24/06

11/15/13

TRADED
FC 05/15/06

FGIC

11

#64989KFS0

| Bid | Price |
|------------|-----------|
| 1.25-0.575 | \$111.998 |
| 1.35-0.450 | \$111.764 |
| 1.49-0.075 | \$111.638 |
| 111.561 | \$111.561 |
| 1.80-0.200 | \$110.414 |
| 1.65-1.275 | \$109.869 |

| Delta |
|-------|
| 0.234 |
| 0.360 |
| 0.437 |
| 1.584 |
| 2.129 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |
| 6 |

Total Bids : 6

250m NY BROOKHAVEN NY REF N/C PUB IMPT G.O. OY
3.700 B/E AMBAC UND: Aa2/AA

5.000
DD 05/16/07

06/01/14

12:00
FC 06/01/07

AMBAC

12

#113152LZ3

| Bid | Price |
|------------|-----------|
| 1.6-0.375 | \$112.686 |
| 1.65-0.450 | \$112.404 |
| 1.75-0.324 | \$112.119 |
| 1.85-0.450 | \$111.584 |
| 110.925 | \$110.925 |
| 2.15-0.325 | \$110.491 |
| 2.00-1.275 | \$110.148 |
| 107.575 | \$107.575 |

| Delta |
|-------|
| 0.282 |
| 0.567 |
| 1.102 |
| 1.761 |
| 2.195 |
| 2.538 |
| 5.111 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |
| 6 |
| 7 |
| 8 |
| Pass |

PASS

Total Bids : 8

170m PA ERIE PA HIGHER ED BLDG AUTH REV RADIAN
OY 4.830 ERP GANNON UNIV B/E

5.000
DD 06/26/07

05/01/32

TRADED
FC 11/01/07

RADIAN

13

#295435AJ0

| Bid | Price |
|------------|----------|
| 5.45-2.125 | \$92.156 |
| 5.50-2.925 | \$90.749 |
| 89.765 | \$89.765 |
| 89.305 | \$89.305 |
| 88.549 | \$88.549 |

| Delta |
|---------|
| 17@100; |
| 1.407 |
| 2.391 |
| 2.851 |
| 3.607 |

| Rank |
|-------------|
| [SNK 05/28] |
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |
| Pass |
| Pass |

PASS

PASS

Total Bids : 5

100m TX FORT BEND CNTY TX MUN UTIL DIST NO 23
WW/SS G.O. OID 4.750 B/E CFIG UND:
/BBB+

4.625
DD 10/01/07

09/01/35

1:00
FC 09/01/08

CFIG

14

#34679RDL0

| Bid | Price |
|--------|----------|
| 92.075 | \$92.075 |
| 91.215 | \$91.215 |
| 89.550 | \$89.550 |
| 88.692 | \$88.692 |
| 79.875 | \$79.875 |

| Delta |
|---------|
| 14@100; |
| 0.860 |
| 2.525 |
| 3.383 |
| 12.200 |

| Rank |
|------|
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |

Total Bids : 5

50m NY NY NY CITY TRANSITIONAL FIN AUTH BLDG
AID REV OID 4.400 B/E NATL UND: Aa3/AA-

4.250
DD 03/15/07

01/15/34

TRADED
FC 07/15/07

NATL

15

#64972HDR0

| Bid | Price |
|------------|----------|
| 4.58-0.250 | \$95.015 |
| 94.400 | \$94.400 |
| 4.60-0.920 | \$94.068 |
| 4.66-0.250 | \$93.913 |
| 91.750 | \$91.750 |

| Delta |
|---------|
| 17@100; |
| 0.615 |
| 0.947 |
| 1.102 |
| 3.265 |

| Rank |
|-------------|
| [SNK 01/32] |
| 1 |
| 2 |
| 3 |
| 4 |
| 5 |

Total Bids : 5

15m NY NY ST HSG FIN AGY HOSP & NURSING HOME
PROJ ETM OY PAR SINKING FUND IS STILL
ACTIVE REG UND: WR/

7.000
DD 10/01/77

11/01/17etm
TRADED
FC 05/01/78

16

#649861AK7

| Bid | Price |
|---------|-----------|
| 117.100 | \$117.100 |
| 115.540 | \$115.540 |
| 115.093 | \$115.093 |
| 114.064 | \$114.064 |
| 99.250 | \$99.250 |

| Delta |
|---------|
| 10@100; |
| 1.560 |
| 2.007 |
| 3.036 |
| 17.850 |

| Nr /NR | Rank |
|--------|-------------|
| | [SNK 11/08] |
| | 1 |
| | 2 |
| | 3 |
| | 4 |
| | 5 |

Total Bids : 5

10m WI CALUMET CNTY WI PROM NTS B/Q N/C PUB
IMPT G.O. OY 2.250 B/E UND: Aa2/

3.100
DD 04/01/09

12/01/12
TRADED
FC 12/01/09

17

#131420CP4

| Bid | Price |
|-----------|-----------|
| 102.280 | \$102.280 |
| 2.9-2.000 | \$98.474 |
| 97.100 | \$97.100 |
| PASS | |

| Delta |
|-------|
| 3.806 |
| 5.180 |

| Aa2 /AA | Rank |
|---------|------|
| | 1 |
| | 2 |
| | 3 |
| | Pass |

Total Bids : 3

20m WI FOND DU LAC CNTY WI PROM NTS B/Q N/C
PUB IMPT G.O. OY 3.200 B/E UND: Aa2/

4.000
DD 04/06/09

03/01/16
TRADED
FC 03/01/10

18

#344442JM1

| Bid | Price |
|------------|-----------|
| 104.895 | \$104.895 |
| 104.700 | \$104.700 |
| 3.00-1.549 | \$103.676 |
| 3.10-2.330 | \$102.358 |
| 4.3-1.550 | \$96.935 |
| PASS | |

| Delta |
|-------|
| 0.195 |
| 1.219 |
| 2.537 |
| 7.960 |

| Aa2 /NR | Rank |
|---------|------|
| | 1 |
| | 2 |
| | 3 |
| | 4 |
| | 5 |
| | Pass |

Total Bids : 5

10m WI WEST ALLIS WI PROM NTS B/Q N/C PUB IMPT
G.O. OY 3.100 B/E UND: Aa2/

3.500
DD 04/01/09

04/01/15
TRADED
FC 10/01/09

19

#951173EL3

| Bid | Price |
|------------|-----------|
| 103.600 | \$103.600 |
| 2.46-2.399 | \$102.292 |
| 101.500 | \$101.500 |
| 2.85-2.980 | \$99.921 |
| 4.1-2.000 | \$95.398 |
| PASS | |

| Delta |
|-------|
| 1.308 |
| 2.100 |
| 3.679 |
| 8.202 |

| Aa2 /AA | Rank |
|---------|------|
| | 1 |
| | 2 |
| | 3 |
| | 4 |
| | 5 |
| | Pass |

Total Bids : 5

25m MD NORTHEAST MD WASTE DISP AUTH SOLID REV
REF AMT *AMT* OY 4.570 ERP MONTGOMERY
COUNTY B/E AMBAC UND: Aa3/

5.500
DD 04/03/03

04/01/16
TRADED
FC 10/01/03

20

#664257BA9

| Bid | Price |
|------------|-----------|
| 3.50-1.210 | \$104.099 |
| 3.70-1.000 | \$103.762 |
| 3.50-2.000 | \$103.309 |
| 3.90-1.190 | \$103.028 |
| 101.550 | \$101.550 |
| 100.850 | \$100.850 |
| 100.500 | \$100.500 |
| 97.500 | \$97.500 |

| Delta |
|---------|
| 13@100; |
| 0.337 |
| 0.790 |
| 1.071 |
| 2.549 |
| 3.249 |
| 3.599 |
| 6.599 |

| AMBAC | Rank |
|-------|------|
| | 1 |
| | 2 |
| | 3 |
| | 4 |
| | 5 |
| | 6 |
| | 7 |
| | 8 |

Total Bids : 8

25m OH LAKOTA OH LOC SUP DIST B/Q G.O. BID
4.470 B/E AGM UND: Aaa/

4.375
DD 01/24/06

12/01/05
3:00
FC 06/01/06

5

#512804TJ4

| Bid | Price |
|-------------|----------|
| 4.57-0.500 | \$96.708 |
| 95.500 | \$95.500 |
| 4.749-2.722 | \$92.017 |
| 91.650 | \$91.650 |

Total Bids : 4

15@100;
Delta

1.208
4.691
5.058

AGM

{SNK 12/28}

Rank
1
2
3
4

21

35m MI DETROIT MI PUB IMPT G.O. OY 5.000 B/E
NATL UND: Ba3/BB

5.125
DD 08/08/02

04/01/22
3:00
FC 10/01/02

#251093WW6

| Bid | Price |
|-------------|----------|
| 89.614 | \$89.614 |
| 6.718-0.500 | \$86.640 |
| 85.175 | \$85.175 |
| 80.160 | \$80.160 |
| 74.500 | \$74.500 |
| PASS | |

Total Bids : 5

11@100;
Delta

2.974
4.439
9.454
15.114

NATL

Rank
1
2
3
4
5
Pass

22