

November 2, 2012

Ronald W. Smith
Corporate Secretary
Municipal Securities Rulemaking Board
1900 Duke Street
Alexandria, VA 22314

Re: MSRB Notice 2012-50 (October 2, 2012) Request for Comment on Proposed Rule Amendments and Interpretive Notice on Retail Order Periods

Dear Mr. Smith:

Edward Jones appreciates the opportunity to comment on the Municipal Securities Rulemaking Board's ("MSRB") Request for Comment on Revised Draft Rule Amendments and a Revised Draft Interpretive Notice on Retail Order Periods. (The "Revised Proposal")

Edward Jones commends the MSRB for seeking to preserve the integrity of the retail order period process and enhance protections to issuers and the retail investor in the municipal bonds market. Edward Jones prides itself in providing personalized service and long term investment opportunities to more than seven million long-term individual investors. In doing so, Edward Jones seeks to underwrite high quality municipal bonds for our financial advisors to offer to retail clients where such an investment contributes to the balance and diversification of the client's portfolio.

In our experience, the true retail investor purchases municipal securities with the intent to hold the security for long term tax and income purposes. Typically, retail investors have more limited financial resources. The typical individual retail investor is not purchasing for the purpose of achieving capital appreciation, like many professional retail-separately managed accounts (SMAs).

Additionally, it is our experience that those issuers who seek to utilize a retail order period do so to expand the local constituent's opportunity to own the bond issue. Such an expanded opportunity creates community pride, generates further support for the issue and as a by-product increases demand by those retail investors who typically hold the bond long term. This model may lead to lowered issuer borrowing costs because it further engages the "buy and hold" retail investor while enlisting the institutional investor. It may also help to curtail the detrimental practice known as "flipping" to the true retail investor.

We understand the MSRB's concern of the effect that a uniform definition of "retail" may have on the issuer. In order to achieve MSRB's retail order period protection and enhancement objectives for both the issuer and the retail investor, we suggest retail order size priority protections. For instance, we would suggest that first priority be placed on orders of 100 bonds or less with further subordinate

priority levels for larger quantities. Allowing retail order size prioritization grants the issuer the flexibility of defining "retail", while increasing availability to the typical "buy and hold" retail investor at the initial offering price.

Furthermore, Edward Jones strongly supports the provisions of the Proposed Interpretive Notice ("Interpretive Notice") reminding dealers of their duty of fair pricing to customers under Rule G-30(a), particularly with regard to securities sold to retail investors. We also seek further guidance on the MSRB's current Interpretive Notice example regarding fair pricing of those securities with different coupons where the yield to call is the same for securities with the same maturities sold to retail and institutional customers. Take for example the following:

Coupon	Maturity	Price	YTC	YTM
3.00	11/1/32	100.000	3.00	3.00
4.00	11/1/32	108.584	3.00	3.40
5.00	11/1/32	117.168	3.00	3.77

In this scenario, the retail investor is likely to purchase the par bond at the lower coupon while the institutional customer may prefer to purchase bonds at a premium. While it is true that the yield to call is the same for all, the yield potential is much greater for the institutional investor in rising interest rates markets. Depending on market conditions and the actual characteristics of the securities, it seems that such a scenario may not achieve the fair pricing objective. We are unclear if this is what the MSRB meant when it provided the most recent example in the Interpretive Notice. Thus, we seek further clarification on how different coupons can impact the yield calculation and what characteristics of securities of the same maturity justify differences in pricing.

Finally, Edward Jones seeks further clarification within the proposed Rule G-11(l) regarding the private customer information required to be provided. As part of the current order detail record keeping requirements, syndicate managers and selling group members maintain information sufficient to verify retail orders. If co-managers and selling group members are required to provide such information to the senior syndicate manager, the Revised Proposal should specify that any identifying information required by the issuer may not include customer account numbers, names, addresses, phone numbers, or Taxpayer Identification numbers. We recommend maintaining the current industry practice of providing a zip code with the retail order be maintained and officially adopted.

Edward Jones appreciates the opportunity to comment on the MSRB's Revised Proposal and Interpretive Notice, and would be pleased to share additional information if requested.

Sincerely,
Edward D. Jones & Co., L.P.



David Fischer-Lodike
Capital Markets & Operations Compliance

Cc: Mary Burnes / Capital Markets Group Principal
Pamela K. Cavness / Chief Compliance Officer
James Tricarico / General Counsel