

May 6, 2013

By Electronic Delivery

Ronald W. Smith, Corporate Secretary Municipal Securities Rulemaking Board 1900 Duke Street, Suite 600 Alexandria, Virginia 22314

Re: College Savings Foundation's Comments on MSRB Notice 2013-07: Request for Comment on Revisions to Suitability Rule

Dear Mr. Smith:

The College Savings Foundation ("CSF") is a not-for-profit organization with the mission of helping American families achieve their education savings goals by working with public policy makers, media representatives, and financial services industry executives in support of 529 college savings plans ("529 Plans" or "Plans"). CSF serves as a central repository of information about college savings programs and trends and as an expert resource for its members as well as representatives of state and federal government, institutions of higher education and other related organizations and associations. CSF's members include state 529 Plans, investment managers, broker-dealers, other governmental organizations, law firms, accounting and consulting firms, and non-profit agencies that participate in the sponsorship or administration of 529 Plans.

CSF supports the proposal to conform Rule G-19 to FINRA's suitability rule and endorses the comments regarding this proposal made by the Investment Company Institute in its May 6, 2013 response letter to Notice 2013-07. We appreciate the opportunity both to comment on Notice 2013-07 and to continue the dialogue with the MSRB on 529 college savings plans. Please do not hesitate to contact us with any questions or for more information. You may reach CSF by calling Kathy Hamor at (703) 351-5091.

Sincerely,

Roger Michaud Chairman,

College Savings Foundation