



By Electronic Delivery

May 6, 2013

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

Re: Comments Concerning MSRB Notice 2013-07
Request for Comment on Revisions to Suitability Rule

Dear Mr. Smith:

The College Savings Plans Network (CSPN), on behalf of its members, is pleased to have this opportunity to comment on MSRB Notice 2013-07, *Request for Comment on Revisions to Suitability Rule* issued March 11, 2013 (the "Notice"). We appreciate the Municipal Securities Rulemaking Board's (the "MSRB") continuing commitment to assist consumers seeking to invest in 529 College Savings Plans ("529 Plans") and its interest in ensuring dealers obtain comprehensive information regarding customers, their savings goals and risk tolerance, among other things, prior to recommending a particular investment opportunity. We are dedicated to working with the MSRB in its efforts to harmonize its suitability rules with those issued by the Financial Industry Regulatory Authority.

Endorsement of Investment Company Institute Comment Letter

CSPN is supportive of the comments relating to 529 Plan suitability requirements under the heading "*Recommendations Relating to 529 Plan Suitability Requirements*" to be submitted by the Investment Company Institute and endorses that portion of its comment letter on the Notice dated May 6, 2013.

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Thank you again for providing an opportunity to comment on the Notice. Please do not hesitate to contact us with any questions or for more information. You may reach CSPN by calling Chris Hunter at (859) 244-8177.

Sincerely,

A handwritten signature in cursive script that reads "Michael L. Fitzgerald". The signature is written in black ink and is positioned below the word "Sincerely,".

Hon. Michael L. Fitzgerald
Treasurer of Iowa and
Chairman, College Savings Plans Network