Comment on Notice 2014-04

from Edwin Blitz, Edwin C. Blitz Investments, Inc.

on Tuesday, March 18, 2014

Comment:

In light of the amended and pending rules, it is time for MSRB to consider the practical and realistic manner in which College Plans should be placed under the purview and regulations of FINRA. Most, if not all, College plans are offered by Mutual Fund Sponsors subject to review by FINRA at time of audit. Since we only engage in the sale of Municipal Bonds through Mutual Funds, why must we remain under the jurisdiction of MSRB. Our sale of College plans does not justify the fees incurred each year from MSRB. It is our hope that reason will prevail and the sale of College Mutual Find Plans will no longer require registration under the MSRB.