



The **Courage** to Question Convention.
The **Passion** to Break New Ground.
The **Insight** to Champion Community.
The **Imagination** to Pursue the Undiscovered.
The **Will** to Achieve Greatness.
The **Promise** of a Limitless Future.
The **People** to Bring It to Life.
It's Happening Here.

September 4, 2015

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

Dear Mr. Smith:

I am pleased to submit this letter in response to the Municipal Securities Rulemaking Board's request for comments on establishment of an academic historical trade data product. This new product will advance market transparency, investor education, and issuer understanding of the trading of their bonds.

My interest stems from a background of municipal bond research, service as a chief financial officer of several universities as well as the Commonwealth of Kentucky, and now the President of a public research university with almost \$250 million in municipal bonds outstanding.

The opportunities afforded by the proposed new academic data product are consistent with the goal of university research which is to increase fundamental knowledge and understanding. Moreover, it is consistent with the mission of the Municipal Securities Rulemaking Board to promote a fair and efficient market. The Securities and Exchange Commission, and its own Investor Advocate, has commented on the need to improve transparency in the municipal market. As we know from the scholarly work in corporate finance, basic research can lead to improvements in market practices.

Universities are laboratories of basic research, but that fundamental work rests upon the availability of timely quality data. The MSRB has greatly contributed to the development of a robust research community on municipal securities. I applaud the proposed new academic historical trade data product for the opportunity it offers university researchers to explore the microstructure of the secondary market for municipal securities in more detail than heretofore possible.

The current historical trading data available from the MSRB does not allow university researchers to track round-trip trades (e.g., customer-to-dealer-to-customer), thus negating rigorous study. The proposed new academic data product would anonymize dealer identifiers which is a reasonable middle ground if it allows tracking unique trades (not groupings by size or volume).

Scientific inquiry is based on the ability to replicate the results of research. It is impossible to achieve this fundamental goal if the data remains off-limits to academic research. Even with the proposed new academic product and its plan to anonymize dealer identifiers, university researchers will be unable to replicate the work you published in the July 2014 "Report on Secondary Market Trading in the Municipal Securities Market" that used dealer identifiers. A related issue regarding replication of research arises if later research calls into question the original research product. The original dataset must be available to permit replication under the same restrictions as before. The MSRB agreement should not be viewed as a (short) time limited agreement.

Timely data is critical. The proposed 24 month delay for release of the data seems excessive and counter to the goal of promoting fair and efficient market practices. A 12 month delay would be reasonable.

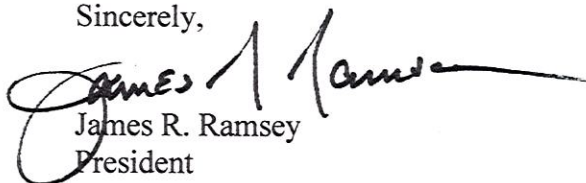
Research universities are used to strict accountability for handling proprietary (and even highly classified national security) data. We expect it and set up strong internal controls. State universities have to adhere to state law which almost always prohibits us from indemnifying other parties. The unlimited damages provision of the proposed MSRB-university agreement is likely to render the proposed academic product out of the legal reach of university researchers. I encourage a provision that limits damages to that university's state legal limitation.

Providing copies of published work is reasonable. Academic freedom would not consider reasonable any requirement for advance screening of a university researcher's scholarly product.

In conclusion, I support the availability of the proposed new academic historical trade data product. It will advance a fair and efficient municipal market, milestones of the statutory responsibilities of the Municipal Securities Rulemaking Board and the Securities and Exchange Commission.

Thank you for the opportunity to submit these comments.

Sincerely,


James R. Ramsey
President