



American Funds Distributors, Inc.
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Los Angeles, California 90071-
1406

VIA ELECTRONIC DELIVERY

September 21, 2017

Ronald W. Smith, Corporate Secretary
Municipal Securities Rulemaking Board
1300 I Street, NW, Suite 1000
Washington, DC 20005

Re: MSRB Notice 2017-17

Dear Mr. Fields:

American Funds Distributors serves as principal underwriter to the American Funds, one of the oldest and largest mutual fund families in the nation. We are also the distributor and underwriter of CollegeAmerica, a qualified tuition program (as defined in Section 529 of the Internal Revenue Code), sponsored and issued by the Commonwealth of Virginia. CollegeAmerica is the largest 529 college savings plan in the nation and as of June 30, 2017, CollegeAmerica represented approximately 21% of the 529 college savings plan market. We appreciate the opportunity to comment on the proposed revisions to MSRB Form G-45, which would require underwriters to: (1) potentially revise how they report the plan's program management fee; (2) identify and annually report the weighted value of each index that comprises the benchmark that the plan uses to benchmark the total returns for investment options within the plan; (3) submit data about how each asset class within an investment option is performing for the annual reporting period ending December 31; and (4) provide information during each semi-annual reporting period about whether an investment option was open to existing investors but closed to new investors or terminated during the reporting period ("Proposal").

We generally concur with the comments submitted by the Investment Company Institute ("ICI") dated September 21, 2017. Although we do not oppose the requirement that 529 plan underwriters report whether an investment option has closed to new investors, we are concerned that the Proposal would

The Capital Group Companies

American Funds Capital Research and Management Capital International Capital Guardian Capital Bank and Trust

require 529 plan underwriters to collect and provide to the MSRB new information, which investment advisers and mutual funds are not currently required to produce or provide to the Securities Exchange Commission (“SEC”) or to any other regulator. This could result in an increase to program costs because, in completing Form G-45, 529 plans like CollegeAmerica will not be able to rely on the same investment results information used by mutual funds in other regulatory filings or public disclosures. Furthermore, we do not understand how the collection of this unique information would be helpful to the MSRB in the effective regulation of municipal fund securities dealers or enhance its ability to better understand the 529 plan market.

We are particularly concerned by the requirement to produce investment results by asset class in a fund as this is not something that Capital Research and Management Company, as investment adviser to the American Funds, systematically monitors or reports to the SEC today. Importantly, the American Funds are managed pursuant to their investment objectives, as disclosed in their prospectuses, which is how shareholders make their fund selection and investment decisions. Our investment professionals manage the funds in their totality to meet these objectives. Requiring underwriters to disclose and report fund performance broken out by asset class would not only be meaningless, but potentially misleading. Moreover, it could negatively impact how a fund is managed by placing inordinate focus on its individual components rather than the investment objective of the fund.

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Thank you for considering these comments. Please feel free to contact me should you have any questions or wish to discuss our thoughts on the current proposal.

Sincerely,



Maria Manotok
Senior Counsel
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