



February 26, 2024

Re: Notice 2023-11 - Request for Information on Impacts of MSRB Rules on Small Firms

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

Dear Mr. Smith,

The American Securities Association¹ (ASA) submits these comments in response to the MSRB's Request for Information (RFI) on Impacts of MSRB Rules on Small Firms.² The RFI solicits public input on any aspects of its rules, or the absence thereof, that may result in undue regulatory, compliance, operational or administrative burdens or other negative unintended impacts on smaller regulated entities.

ASA requests that the MSRB take into account all correspondence ASA has previously submitted regarding how any MSRB proposed rules may adversely impact small and mid-sized firms operating within the fixed income market, as a comprehensive response to inquiries on this matter.

Specifically, we would like to reiterate recent comments and objections to the MSRB's Request for Comment on Transaction Reporting Obligations under MSRB Rule G-14³ combined with the MSRB's Notice of Filing to the SEC of a Proposed Rule Change to Amend MSRB Rule G-14 to Shorten the Timeframe for Reporting Trades in Municipal Securities⁴. We include those letters as **Exhibit A** and **Exhibit B**, maintaining our objections to the initial and revised proposal.

The objections raised by ASA to proposed changes to Rule G-14 center on smaller and mid-size broker-dealers and their customers. As we argued in those letters, the proposed changes lack evidence of a market failure to justify such changes and would not provide tangible benefits to

¹ ASA is a trade association that represents the retail and institutional capital markets interests of regional financial services firms who provide Main Street businesses with access to capital and advise hardworking Americans how to create and preserve wealth. ASA's mission is to promote trust and confidence among investors, facilitate capital formation, and support efficient and competitively balanced capital markets. This mission advances financial independence, stimulates job creation, and increases prosperity. ASA has a geographically diverse membership base that spans the Heartland, Southwest, Southeast, Atlantic, and Pacific Northwest regions of the United States.

² MSRB Notice 2023-11, Request for Information on Impacts of MSRB Rules on Small Firms, available here: <https://www.msrb.org/sites/default/files/2023-12/2023-11.pdf>.

³ MSRB Notice 2022-07, Request for Comment on Transaction Reporting Obligations under MSRB Rule G-14, available here: <https://www.msrb.org/sites/default/files/2022-09/2022-07.pdf>.

⁴ SEC Release No. 34-99402, Notice of Filing to the SEC of a Proposed Rule Change to Amend MSRB Rule G-14 to Shorten the Timeframe for Reporting Trades in Municipal Securities, available here: <https://www.sec.gov/files/rules/sro/msrb/2024/34-99402.pdf>.





investors. ASA specifically opposes reducing the reporting time for manual trades from 15 minutes to 1 minute, arguing that the complexities involved in the manual trade reporting process necessitate the current 15-minute reporting period. Reducing this timeframe would introduce significant operational challenges, particularly in addressing discrepancies between sales and trader tickets, and could disrupt the efficient execution of trades. Consequently, the heightened burden of 1 minute trade reporting requirements could negatively impact investors from receiving Best Execution on a given trade order, as the firm trading desk could be potentially hindered by the limited timeframe to search multiple marketplaces for best price of execution if they need to adhere to the 1 minute trade reporting window.

Moreover, we express concern that the proposed changes are based on incomplete assumptions and lack hard data to support their necessity. Financial regulators, including the MSRB have embarked on rulemaking agendas whose scope and speed are wholly unwarranted by congressional mandate or financial crisis. To force regulatory changes without justification could harm investors and threaten the participation of small and mid-sized broker-dealers in the municipal securities market now and into the future.

We have conveyed to the MSRB directly, through comment letters, and via statements and publications in the press that implementing unnecessary and burdensome municipal market regulation will adversely affect small brokers nationwide. Well-capitalized and more-resourced firms can absorb additional costs imposed by regulations, while small-and medium-sized firms will be burdened by costs and unnecessary compliance leading to negative unintended consequences for financial markets and those who rely on them.

By increasing regulatory compliance requirements, the MSRB, SEC, and other financial regulators will greatly reduce the viability and health of small-and medium-sized firms who meet the needs of retirement savers, Main Street businesses, and communities across America. These firms do not gain from flawed premises being marginally improved through self-negotiation. Instead, firms will prosper when regulators refrain from disrupting a market that currently operates effectively.

We would also like to submit for consideration an op-ed published in the Bond Buyer⁵. In that piece, ASA voiced concerns about the potential unintended negative impacts and unfair burdens that certain regulatory changes could impose on smaller regulated entities operating within the fixed income market. Specifically, we emphasize the resilience of the fixed income market, which has weathered numerous crises and black swan events without experiencing market failures. We also strongly caution against unjustified regulatory changes that could increase costs for governments, municipalities, states, and millions of American investors by making it more difficult for small and mid-sized firms to compete in the marketplace. ASA asks the MSRB to

⁵ ASA op-ed written by Christopher A. Iacovella, CEO, ASA, published June 6, 2023 in the Bond Buyer, available here: <https://www.bondbuyer.com/opinion/fixed-income-doesnt-need-more-regulation>.





consider our full op-ed as a component of the information it considers in response to this RFI. We have included the full op-ed as **Exhibit C**.

Overall, ASA advocates for preserving the integrity and functionality of U.S. fixed income markets to benefit local communities, small businesses, and working families, emphasizing the importance of policies that work for the American people. We suggest regulators engage with firms of all sizes, including small-and medium-sized participants, to understand the regulatory, compliance, operational, administrative, and other impacts of market regulation. We also urge regulators to seek industry expertise before considering new policies and continue to emphasize the importance of ongoing communication and collaboration with market professionals.

Any regulatory action lacking adequate justification or evidentiary support risks impeding the involvement of small, regulated entities in the municipal securities market by exacerbating operational hurdles and compromising investor interests. Ultimately, any changes to fixed income markets should be rooted in law, driven by evidence-based understanding, and capable of withstanding unforeseen crises.

Sincerely,

Jessica Giroux

Jessica R. Giroux
General Counsel
American Securities Association





September 30, 2022

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

Ms. Jennifer Piorko Mitchell
Office of the Corporate Secretary
Financial Industry Regulatory Authority
1735 K Street NW
Washington, DC 20006

Re: Request for Comment on Transaction Reporting Obligations under MSRB Rule G-14; Request for Comment on Proposal to Shorten the Trade Reporting Timeframe for Transactions in Certain TRACE-Eligible Securities From 15 Minutes to One Minute

Dear Mr. Smith and Ms. Mitchell:

The American Securities Association (ASA)¹ submits these comments in response to proposals issued by the Municipal Securities Rulemaking Board (MSRB) and Financial Industry Regulatory Authority (FINRA) that would mandate corporate and municipal fixed income securities trades to be reported within one minute (the “Proposals”). As explained in more detail throughout this letter, the ASA is concerned that the MSRB and FINRA have failed to identify a market failure that warrants such a significant change, and that the Proposals would disproportionately impact smaller and mid-size broker-dealers and their customers.

Since 2005, MSRB Rule G-14 and FINRA Rule 6730 have required trades to be reported “as soon as practicable” but not later than 15 minutes after the time of trade. As noted in both of the Proposals, the vast majority of trades for both municipal and corporate securities are already reported sooner than 15 minutes. Since the previous amendments to Rule G-14 and Rule 6730

¹ The ASA is a trade association that represents the retail and institutional capital markets interests of regional financial services firms who provide Main Street businesses with access to capital and advise hardworking Americans how to create and preserve wealth. The ASA’s mission is to promote trust and confidence among investors, facilitate capital formation, and support efficient and competitively balanced capital markets. This advances financial independence, stimulates job creation, and increases prosperity. The ASA has a geographically diverse membership base that spans the Heartland, Southwest, Southeast, Atlantic, and Pacific Northwest regions of the United States.





were adopted, MSRB's Electronic Municipal Market Access (EMMA) and FINRA's Trade Reporting and Compliance Engine (TRACE) systems have greatly improved the transparency in these markets and provided investors with decision-useful information. It is unclear how a shift to a uniform one-minute timeframe (for vastly different markets and products) would benefit investors when considering the costs such a mandate would create.

More concerningly, the Proposals are being put forward at a time when other changes to the regulation of the fixed income markets – for example Securities and Exchange Commission's (SEC) Rule 15c2-11 and a pending proposal to institute a T+1 settlement window – are coming online. The ASA remains concerned that these fundamental changes to rules that govern fixed income trading will disrupt otherwise well-functioning markets and are based upon incomplete or flawed assumptions.

The ASA wishes to provide the following views regarding the Proposals:

- I. The MSRB and FINRA have not properly identified or explained a market failure – or evidence of investor harm – that would justify the Proposals;**
- II. The costs of the Proposals are likely to be substantial on broker-dealers and their customers, while the benefits are unclear – a reality implicitly acknowledged in the Proposals;**
- III. The Proposals do not properly consider the different ways in which certain trades are executed (i.e. voice vs. electronic trading) and how that can impact trade reporting timelines; and**
- IV. The Proposals would create logistical challenges for firms that have not been fully analyzed by the MSRB and FINRA.**

These views are discussed in further detail below.

- I. FINRA and MSRB have not properly identified or explained a market failure – or evidence of investor harm – that would justify the Proposals.**

The Proposals are notable in that they offer scant evidence for why current reporting requirements are inadequate or how investors would benefit by a shift to a mandated one-minute time frame. FINRA posits that reducing the reporting time frame will “solidify the benefits of the technological advancements that have occurred since 2005 by requiring timelier reporting in the rule” while MSRB makes similar claims that improved technology is a justification for its proposal.





However, simply because technology may exist that allows dealers to report some, but not all, trades within one minute is not sufficient justification for a rulemaking. Neither FINRA or MSRB offer any empirical evidence or past research that would support a one-minute requirement, and neither self-regulatory organization (SRO) identifies any specific instances of investor harm due to current requirements.

The MSRB and FINRA should consider the significant amount of resources that broker-dealers have already expended over the last fifteen years to be able to report trades within this window. The data provided by both FINRA and MSRB shows that roughly 97 percent of municipal and corporate trades are reported within five minutes. This demonstrates that with today's technological capabilities, five minutes has become the de facto "as soon as practicable" standard for the vast majority of trades. When certain factors (e.g. trade size, voice trading) are all taken into account, five minutes is typically the fastest time on average for trades to be reported.

II. The costs of the Proposals are likely to be substantial on broker-dealers and their customers, while the benefits are unclear – a reality implicitly acknowledged in the Proposals.

As noted above, the Proposals offer little explanation as to the benefits of a one-minute requirement other than "increased transparency" in the municipal and corporate bond markets. The ASA has supported many past efforts by the SROs and SEC to promote transparency in the markets, however the Proposals do not offer any evidence which shows that a one-minute timeframe would make any material difference in price than current requirements and market practice. At the same time, the Proposals acknowledge many of the costs that would be imposed on broker-dealers for implementing these changes. According to FINRA's proposal:

FINRA believes that the proposal would likely result in direct and indirect costs for firms to implement changes to their processes and systems for reporting transactions to TRACE in the new timeframe. Firms that do not have automated reporting systems in place may incur costs from establishing such systems and infrastructure. Table 3 shows that, even for very active firms that most likely have a trade reporting infrastructure in place, some trades are still reported later than one minute from the time of execution. For these trades, firms may incur costs to modify their reporting procedures to report more quickly and monitor that the trades are reported in the required timeframe.

A higher percentage of less-active reporters submitted 95 percent of their trades within one minute than moderately active reporters, possibly suggesting that use of a third-party reporting system by less-active reporters may be associated with faster reporting. While members currently using a third-party reporting service may incur less costs, those that do not currently use a third-





party reporting service may opt to do so if the costs would be lower than building their own system.²

Similarly, MSRB's proposal states:

The MSRB acknowledges that dealers would likely incur costs, relative to the baseline state, to meet the new transaction reporting time of one minute outlined in the Proposal to Rule G-14. These changes would likely include the one-time upfront costs related to adopting new technologies or upgrading existing technologies to speed up the trade reporting for some dealers, as well as setting up and/or revising policies and procedures. Since 76.9% of all relevant trades already report within one minute, the cost to comply with the proposed change would not be as significant if the current one-minute compliance rate was substantially lower.

For the upfront costs, it appears smaller firms would have difficulty with the proposed one-minute reporting requirement. The MSRB is basing this assumption on an internal analysis showing smaller firms lagging behind larger firms in reporting time...³

Thus, the SROs acknowledge that: 1) smaller broker-dealers would have difficulty coming into compliance with the new rules; and 2) some firms may have to hire a third-party in order to meet the one-minute requirement. The ASA notes that several smaller firms have already submitted letters to FINRA and MSRB outlining the challenges and costs that would be created by a one-minute requirement. We implore FINRA and MSRB to consider these real and substantial costs and weigh them against the unsubstantiated purported benefits outlined in the Proposals.

III. The Proposals do not properly consider the different ways in which certain trades are executed (i.e. voice vs. electronic) and how that can impact trade reporting timelines.

As noted previously, under current rules and existing technological capabilities, the vast majority of corporate and municipal trades are reported within five minutes. There appears to be an underlying presumption in the Proposals that due to the increase in electronic trading, in many cases it would be relatively straightforward transition for firms to begin reporting trades in one minute. However, that presumption does not consider how certain trades – particularly larger ones – are executed and the logistical challenges that a one-minute mandate would impose. For example, the MSRB proposal states:

While 80.3% of trades with trade size of \$100,000 par value or less were reported within one minute, only 40.1% of trades with trade size between \$1,000,000 and \$5,000,000 par value and 25.3% of trades with trade size above \$5,000,000 par value were reported within one minute.⁴

² FINRA Proposal at 13

³ MSRB Proposal at 10

⁴ MSRB Proposal at 4





Underlying this data is the fact that larger trades tend to be executed by voice, while smaller trades (including retail trades) have increasingly been done via electronic platforms. Voice brokerage can take substantial time to negotiate and report once the trade is executed. It is entirely possible and reasonable that large, voice-executed trades may not be able to be reported within one minute. The SROs must be careful not to equate for regulatory purposes smaller, retail trades that can be easily executed with the click of a button with larger institutional trades that take more time to be processed. Some firms may also use platforms that do not direct straight to BETA and would therefore have to take the time within one minute to manually enter trade information into BondWorks. For voice trading, doing all of this in a one-minute timeframe would in many cases be unrealistic.

Additionally, the Proposals' one-minute requirement is a hard and fast timeframe and would not provide any exception for bona fide errors when entering trades. The current time requirement allows traders to correct price or quantify numbers of transposed digits on a CUSIP. If the Proposals were adopted, firms may not have sufficient time to correct such errors and would technically be in violation of a rule if not corrected in time.

IV. The Proposals would create logistical challenges for firms that have not been fully analyzed by MSRB and FINRA.

If implemented, the Proposals would create several logistical hurdles that have not been adequately considered and would be challenging for firms to meet a one-minute reporting requirement.

For example, if a CUSIP has not been traded at a particular firm previously, that firm would have to set up a CUSIP prior to reporting the trade, something that it may eventually have to do for hundreds of securities it has not traded before. Similarly, if there is a dealer trading through an ATS that is not setup by another firm trading through the same ATS, that could create complexities for firms to comply with one minute.

Additionally, the Proposal could create an incentive for firms to "auto-route" more orders to help with compliance. This will mean that less individuals at firms are involved with handling orders which could have consequences for price improvement and best execution obligations. Firms may find themselves with no option other than to auto-route orders in order to meet the one-minute timeframe. As with other aspects of the Proposals, the ASA urges MSRB and FINRA to consider these unintended consequences before considering further action.





american securities association

America's Voice for Main Street's Investors

Conclusion

The corporate and municipal fixed income markets have proven themselves to operate with increasing efficiency, even during times of stress that markets have experienced in recent years. We are concerned that significant regulatory changes – particularly when based upon incomplete assumptions – would be harmful to investors and threaten the participation of small and mid-sized broker-dealers in these markets. Accordingly, the MSRB and FINRA should drop the Proposals in their entirety.

Sincerely,

Kelli McMorrow

Kelli McMorrow
Head of Government Affairs
American Securities Association



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202.621.1784



VIA ELECTRONIC MAIL to: rule-comments@sec.gov

February 16, 2024

Re: Request for Comment on Transaction Reporting Obligations under MSRB Rule G-14; Request for Comment on Proposal to Shorten the Trade Reporting Timeframe for transactions in Certain TRACE-Eligible Securities From 15 Minutes to 1-Minute

Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Dear Ms. Countryman,

The American Securities Association¹ (ASA) submits these comments in response to proposals issued by the Municipal Securities Rulemaking Board² (MSRB) and the Financial Industry Regulatory Authority³ (FINRA, collectively with MSRB the ‘SROs’) that would mandate municipal and corporate fixed income securities trades to be reported within one minute (the ‘Proposals’).

We would like to reiterate comments⁴ ASA sent to the SROs in a letter dated September 30, 2022, concerning the initial Proposals. In the 2022 letter, we explained in detail that the Proposals lack evidence of a market failure to justify such a change, will not provide a tangible benefit to investors, and will disproportionately impact smaller and mid-size broker-dealers and their customers. Nothing in the interim has changed our views on the subject.

Consequently, we re-submit our initial comment letter as **Exhibit A**, maintaining our objections to the revised Proposal.

Regarding the revised Proposal, the SROs advocate for two exceptions from the one-minute reporting requirement. However, these exceptions do not appreciably alter market dynamics. In light of this, it begs the question: why is the regulatory regime expending valuable resources and

¹ ASA is a trade association that represents the retail and institutional capital markets interests of regional financial services firms who provide Main Street businesses with access to capital and advise hardworking Americans how to create and preserve wealth. ASA’s mission is to promote trust and confidence among investors, facilitate capital formation, and support efficient and competitively balanced capital markets. This mission advances financial independence, stimulates job creation, and increases prosperity. ASA has a geographically diverse membership base that spans the Heartland, Southwest, Southeast, Atlantic, and Pacific Northwest regions of the United States.

² SEC Release No. 34-99402; File No. SR-MSRB-2024-01 (MSRB)

³ SEC Release No. 34-99404; File No. SR-FINRA-2024-004 (FINRA)

⁴ ASA letter to MSRB and FINRA dated September 30, 2022 in response to Request for Comment on Transaction Reporting Obligations under MSRB Rule G-14 and Request for Comment on Proposal to Shorten the Trade Reporting Timeframe for Transactions in Certain TRACE-Eligible Securities From 15 Minutes to One Minute, available here:

<https://www.msrb.org/sites/default/files/2022-09/ASA-MSRB-FINRA-One-Minute-Proposals.pdf>





time to enact a rule that ultimately yields negligible impact? Moreover, any consideration of gradually lowering the compliance threshold over time should require the SROs to solicit additional feedback in a Request for Comment or new proposal, accompanied by a compelling rationale and hard data to support their reasons why accelerating the reporting timeframe is necessary.

Regarding the manual trades exception specifically, we remain troubled by the language which suggests the possibility of reassessing the reporting timeframe, potentially leading to further reductions or even the elimination of the manual trade exception altogether.

The idea that either of any these exceptions could be reduced over time without being proposed for public comment would violate the due process rights of every market participant. It would also set a troubling precedent that would allow SROs to implement changes without an evidentiary or legal justification for doing so.

ASA's position is that maintaining the reporting time at 15 minutes is necessary, considering the complexities involved in the manual trade reporting process. To date, the SROs have failed to prove (using any data) why disrupting a functioning market is at all logical. The only justification we have gotten is that the SEC Chair wants this rule so we should accept it. We reject that reasoning because this is not a monarchy and the Chair of the SEC is not our king.

A significant portion of our firms' institutional transactions, approximately 50%, involve salespeople. At several of our firms, traders have the *sole* authority to commit capital, and thus any trade involving a salesperson qualifies as a manual trade. The current 15-minute reporting period allows firms to address any discrepancies between sales and trader tickets before manually matching them. Reducing this timeframe would introduce significant challenges into the process used to ensure accurate and efficient trade execution.

Similarly, on the retail trading desk, trades conducted outside of certain third-party platforms necessitate the creation of manual trade tickets. While there may not be a matching component involved, completing this process within a shorter timeframe presents considerable operational difficulties, especially considering the simultaneous management of multiple orders by traders.

These are real-world market practices that are not reflected anywhere in the SRO proposals. Accordingly, we strongly advocate for maintaining the manual trade reporting time at 15 minutes without ANY reduction in reporting time frame. There are numerous complexities and potential issues inherent in the manual trade reporting process that require careful attention and consideration.

We remain concerned that regulatory changes based upon incomplete assumptions would be harmful to investors and threaten the participation of small and mid-sized broker-dealers in these markets.





Regulators must be questioned and held accountable when they attempt to issue unsubstantiated "reforms" that would needlessly disrupt well-functioning markets.

The circumvention of regulatory obligations under the Administrative Procedure Act by the SEC and the SROs to push forward with this rule undermines regulatory accountability and public trust. It also raises serious questions about why the SEC wants to avoid conducting a robust economic cost/benefit analysis for policies that impact the fixed income market.

By intentionally sidestepping these requirements, the SEC and the SROs are exposing themselves to legal action. That said, we strongly recommend these Proposals be abandoned in their entirety.

Sincerely,

Christopher A. Iacovella

Christopher A. Iacovella
President & Chief Executive Officer
American Securities Association



THE BOND BUYER

ICYMI: The Fixed Income Market Isn't Broken, So Stop Trying to Fix It

by Christopher A. Iacovella

President & CEO, American Securities Association

The recent failures of regional banks is emboldening Washington's administrative state to double down on regulation. Regulators across the city are rushing to write new rules to further inject Washington's central planners into the functioning of our capital markets.

The American Securities Association, which I run, recently [sent a letter](#) to the Washington bureaucracy with a simple message: leave the U.S. fixed income markets alone.

These markets have performed remarkably well despite the regional bank failures and the Covid crash in March 2020. The resilience of

the fixed income market, having weathered multiple crises and black swan events without experiencing any market failure, is real-time evidence that it works. When markets work, the public must question the motivation for any "regulatory change" sought by professional bureaucrats.

To be very clear, any attempt to use regional bank problems or the March 2020 market volatility as a justification to change the fixed income markets is not only misleading, but it will also needlessly increase costs for the governments, towns, cities, states, and millions of American investors who rely on these markets.

Volatility in fixed income prices, which has risen recently, should not be mistaken for a systemic flaw in market structure or be used as a "strawman" to fix the plumbing and functioning of these markets. Despite the volatility, there have been no issues with pricing, settlement, clearance, or payment in the fixed income markets through multiple black swan events.

The Silicon Valley and Signature Bank failures are also an important reminder that the "risks" regulators identify do not always align with the actual risks in today's markets. On that point, one glaring question is why did they focus on climate risk and ignore the risks rising interest rates posed to the financial system? One might conclude that they missed the real risk in the system because they were so focused on using regulation as a means to inject politics into markets.

Regulators must be questioned and held accountable when they attempt to use unsubstantiated academic theory, ideology, or politics to adopt "reforms" that would needlessly disrupt well-functioning markets.

For example, the Municipal Securities Rulemaking Board has no legal or evidentiary basis to move forward with its costly pre-and post-trade pricing initiatives, FINRA hasn't analyzed the impact of its Rule 4210 amendments on the low-income housing market, and the SEC's unnecessary application of Rule 15c2-11 to fixed income markets would have shut off funding for numerous auto, consumer, and real estate loans. These are a few examples of how untested

theory driving regulatory change threatens to undermine the efficiency, stability, and functioning of the fixed income markets.

Career bureaucrats whose only understanding of bond trading is derived from textbooks and academic papers must not be allowed to test their theories in America's most important capital market.

To avoid this, regulators should seek industry expertise before any new policy is considered. Engaging the industry and the public after an ill-conceived policy has bubbled up within the agency is too late. Ongoing communication and collaboration with market professionals who understand the intricacies of markets is essential to developing a rational, evidence-based approach that maintains a well-functioning market. Involving the voices of experienced bond traders and advisors will help regulators to learn how the fixed income markets function in practice.

Thankfully, the resilience of the fixed income market has proven itself time and time again, which is why any changes to these markets, absent a market failure, must (1) be rooted in law, (2) be driven by a rational, evidence-based understanding of market dynamics, and (3) prove they can withstand unforeseen crises and black swan events.

Our democracy must work for the American people, not the professional class of lawyers and consultants whose compensation rises with every new rule regulators adopt. We care deeply about preserving the integrity and functionality of the U.S. fixed income markets because they drive capital to our local communities, small businesses, and working families that benefits the entire American economy.

Christopher Iacovella is the President and CEO of the American Securities Association

Read the full article at [The Bond Buyer](#).

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