

Comment on Notice 2016-11

from herbert murez,

on Monday, March 28, 2016

Comment:

I invest in munibonds. Brokers typically act as principals. They make a spread between what the issuer gets and what the investor pays. I think that spread should be disclosed, as should other sales to other investors. At times there is a lag between a trade and public disclosure of the terms of that trade. I submit that stale information is useless. Regulation should require the terms of the trade to be publicly available forthwith, not to exceed three market hours in any case, or by the time the market reopens next morning, whichever is less.