

Comment on Notice 2016-24

from Jonathan Roberts, Roberts Consulting, LLC

on Friday, October 14, 2016

Comment:

Our firm is a Municipal Advisor (not related to a broker dealer). Our practice and written supervisory procedures specifically address that our firm will not engage in any municipal advisory services with a municipal entity as client. That is, we serve only obligor clients. The continuing education references a need to include fiduciary duty as part of the curriculum - which duty is not a requirement in respect to the business practices of our firm. We propose that this not be required if it is not applicable to the respective Municipal Advisor..