

July 28, 2009

Securities and Exchange Commission 100 F Street, NE Washington, D.C. 20549-1090

RE: SEC File Number S7-11-09 - Comments on Money Market Reform

Dear Secretary Murphy:

I am writing from iMoneyNet, Inc. to comment on the proposed amendments regarding money market mutual funds. We applaud the SEC for its efforts in initiating these proposed amendments. We feel this is an important step in ensuring the stability and protection of the money market mutual fund industry and its investors.

In regards to the proposal requiring the monthly reporting of portfolio holding securities to the commission, iMoneyNet would like to be considered as a source and provider of this information. With our longstanding position as the leading data provider to the money fund industry we are confident we can collect and deliver the data to your organization in a timely fashion via various electronic formats (XML, XBRL etc) as would be required. We believe that greater transparency strengthens investor knowledge and assists in making better informed investment decisions, ultimately leading to greater stability and confidence in the money fund industry.

iMoneyNet has been collecting money market mutual fund data since 1975 and is the number one provider of money market mutual fund information. We deliver accurate, comprehensive and timely data to institutions around the globe.

Once again, we commend the SEC on the proposed amendments. The proposals only strengthen the financial stability and increase investor protection within the money fund industry. Thank you for the opportunity to provide comments on the SEC's proposed amendments and please feel free to contact me if you have any questions regarding these comments.

Sincerely,

Randy Wood Managing Director iMoneyNet