



COLUMBUS REGIONAL AIRPORT AUTHORITY
PORT COLUMBUS • RICKENBACKER • BOLTON

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Elaine Roberts, A.A.E.
President & CEO

February 16, 2011

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE,
Washington, DC, 20549-1090

Re: File No. S7-45-10 Comments to Proposed Rule Regarding Registration of
Municipal Advisors SEC Release No. 34-63576

Dear Ms. Murphy

I am writing on behalf of the nine volunteer, appointed board members of the Columbus Regional Airport Authority (CRAA), an Ohio port authority and political subdivision, to strongly encourage the SEC to revise the above referenced proposed rule to exempt all, not just elected, governing board members from the proposed registration requirements for municipal advisors. Further, statements made or positions taken by any governing member should not be deemed advice if the statements are made or positions are taken as a part of a fact-finding, deliberative, or decision-making process of the governing board, nor should casual statements made or opinions offered to a municipal entity by any person who is not acting in a professional advisory capacity.

The proposed rule will create significant burdens and risks for our volunteer board members who are leaders in the community and are appointed by elected officials to approve the business and set policies of the CRAA. The municipal advisor registration requirements will cost significant time and money, as well as impose legal liability and SEC scrutiny on volunteer board members who, but for this rule, would not be expected to have the qualifications, training and knowledge of regulated municipal advisors. Additionally, the CRAA would assume significant administrative responsibilities, including record keeping and associated liabilities, at significant cost while we fight to reduce costs in order to attract more passenger and cargo air service and economic development to our community.

The CRAA has long attracted strong board members who in their official duties obtain guidance and feedback from paid legal counsel and financial advisors on any CRAA financing or investments. Our board uses such guidance and feedback in its routine fact-finding, deliberative, or decision-making processes. I am concerned that imposing registration requirements on CRAA board members, and many other boards across the United States, will discourage board participation by qualified community leaders while increasing operating costs and burdens.

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Columbus, Ohio 43219
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Fax: 614-239-4066

Rickenbacker International Airport
7161 2nd Street
Columbus, Ohio 43217
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Fax: 614-491-0662

Bolton Field Airport
2000 Norton Road
Columbus, Ohio 43228
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I urge the SEC to remove from the proposed rule the requirement that appointed board members of municipal issuers register as municipal advisors. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Elaine Roberts" with a long horizontal flourish extending to the right.

Elaine Roberts, A.A.E.
President & CEO

c: Ohio Congressional Delegation