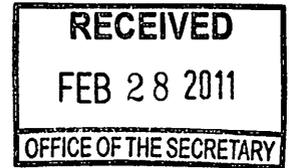




# 761

J. SCOTT DAVISON, CLU, ChFC  
Chief Financial Officer  
OneAmerica Financial Partners, Inc.

February 21, 2011



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

**RE: SEC Proposed Rule 34-63576; File Number S7-45-10**

Dear Ms. Murphy:

I am a member of the Board of Directors for the Indiana Bond Bank, a quasi-governmental agency created by the Indiana General Assembly to assist local governments with the issuance of their debt.

I am writing with great concern about the SEC's definition of who is a municipal financial advisor under SEC Proposed Rule 34-63576.

**A municipal financial advisor provides advice to a state or municipal entity, including public pension funds, as to the issuance of municipal securities, swap transactions and/or investment strategies. I oppose the SEC's proposal to consider appointed members of state and local government governing bodies as financial advisors. A state or local government governing board, comprised of appointed members, cannot serve as an advisor to itself.**

The SEC's proposed rule correctly exempts elected members, elected ex-officio, and employees of a municipal entity's governing board from the definition; however, under the proposed rule, non-elected (appointed) members of a governing board would have to register with the SEC and meet various regulatory requirements set forth by both the SEC and the MSRB, including registration requirements and fees, federal fiduciary standards, federal securities law liabilities, and federal financial disclosure standards.

I urge the SEC to exclude all governing body members and the employees of appointed bodies, including those who serve across jurisdictional boundaries, from the municipal advisor definition.

Appointed members of governing bodies, especially at the local level, typically are citizen volunteers who are interested in serving for the public good and often have special expertise that is critical to the effective functioning of the governing body. However, they may be deterred from serving on state and local governing boards if federal regulations are imposed upon them, which means we lose their valuable insight.

ONEAMERICA companies:

AMERICAN UNITED LIFE  
INSURANCE COMPANY\*\*

AUL REINSURANCE  
MANAGEMENT SERVICES, LLC

ONEAMERICA SECURITIES, INC.

PIONEER MUTUAL LIFE  
INSURANCE COMPANY\*

THE STATE LIFE  
INSURANCE COMPANY\*

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\*A stock subsidiary of American United Mutual Insurance Holding Company

I believe that if Congress had intended for appointed members of governing bodies to be included within the municipal financial advisor definition, it would have made this point clear in the statute. By excluding all governing body members and the employees of appointed bodies from the municipal advisor definition, we can be assured of retaining the expertise our board needs to make important decisions for our constituents.

Thank you for the opportunity to comment on the SEC's Proposed Rule 34-63576.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Scott Davison', with a long horizontal flourish extending to the right.

J. Scott Davison  
Chief Financial Officer