



MID-SIZE BANK COALITION OF AMERICA

Ms. Vanessa Countryman Secretary  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549

Re: In the Matter of the Application of the Texas Stock Exchange  
(TXSE) for Registration as a National Securities Exchange, File No. 10-  
249

Dear Ms. Countryman:

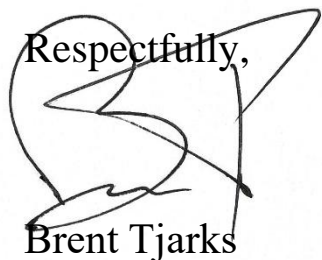
I am writing to the SEC on behalf of the Mid-Size Bank Coalition of America (MBCA) in support of the application of the newly formed Texas Stock Exchange (TXSE) to become a national securities exchange. As background, MBCA represents over one hundred banks with an average of \$20 billion in assets. Our members collectively serve clients and communities through more than 13,000 branches in all 50 states. Member banks are often the largest independent banks in their respective states and represent a business model that plays a critical role in our nation's economy. This is especially true when it comes to the financial services provided to both entrepreneurs and professionals and their respective businesses.

Most of our member banks operate as public companies. Their ability to serve their customers and communities is clearly related to the ability to access capital markets in an efficient and cost-effective manner. Unfortunately, the costs of banks going public and staying public

continues to increase. This is certainly reflected in the data which shows there are now more than 40% fewer public companies today than in 2000. Clearly the trend line has been headed in the wrong direction.

At least part of the increased costs associated with going public and staying public are the costs associated with security exchanges. Just as in banking, competition is good for both customers and the economy as a whole. It appears that there has not been an application for a fully integrated securities exchange before the SEC in many years. Given that today there are functionally only two such exchanges, new entrants to the market should be not only welcomed, but encouraged. A new exchange entrant like TXSE clearly holds the promise of greater price competition, innovation, transparency, improved market data not to mention market liquidity. In sum, any improvements to the securities exchange market will only improve the ability of mid-size banks to better serve their customers. We hope the SEC will give TXSE's application full and fair consideration and help facilitate increased competition.

Respectfully,

A handwritten signature in black ink, appearing to read 'Brent Tjarks', written over a faint, stylized outline of a person's head and shoulders.

Brent Tjarks

President & CEO

Mid-Size Bank Coalition of America