



# ASSOCIATED INDUSTRIES OF FLORIDA

*The Voice of Florida Business Since 1920*

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January 10, 2011

Ms. Elizabeth M. Murphy  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

**RE: AIF Comments to the SEC on the President's Working Group on Financial Markets**

Dear Secretary Murphy,

On behalf of Associated Industries of Florida (AIF) and its more than 10,000 employer-members across the state of Florida, I am writing you to express our association's concern with the recent recommendations from the President's Working Group on Financial Markets that money market mutual funds (MMMFs) maintain a floating Net Asset Value (NAV), rather than a stable \$1 per share as has been the standard.

As you know, cities, municipalities and businesses across Florida depend on money market mutual funds for their short-term financing needs. Furthermore, MMMFs are a reliable source of direct, short-term financing for the private sector. The Working Group's proposals currently being considered could put the financial viability of these trusted financial instruments at risk. With Florida's economy currently facing its highest levels of unemployment in history (12.5%), any proposals – as well intentioned as they may be – that disrupt a company's ability to raise capital will not be well received by the business community.

The proposals currently being considered could reduce the supply of money and increase financing costs. Reducing the assets in MMMFs would reduce demand for commercial paper and increase interest costs to issuers. At a time when access to capital is a challenge for most business owners, increasing the financing costs of proven financial instruments like MMMFs would further erode any hope for rapid job creation and economic activity.

In conclusion, as one of Florida's largest business associations we urge that you protect the long-standing tradition of a stable NAV for money market mutual funds. We fear that any departure from this policy would create *more* risk, not less, and could potentially lead to capital being invested in less transparent financial products.

Sincerely,

Barney T. Bishop III  
President & Chief Executive Officer