



**Salt Lake  
Chamber**  
Utah's Business Leader™

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January 10, 2011



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

Re: File Number 4-619

Dear Ms. Murphy:

The Salt Lake Chamber would like to comment on the recent October report by the President's Working Group on Financial Markets on Money Market Fund Reform Options (PWG Report). The PWG examined several ideas for further regulatory changes. Some of these ideas are of serious concern to many members of the Salt Lake Chamber and other Utah businesses.

In particular, the Salt Lake Chamber is most concerned with the reform ideas related to money market mutual funds. The options identified in the PWG Report would drastically change the nature of money market mutual funds and could threaten their continued existence. For example, the proposal for funds to abandon their stable net asset value (NAV) of \$1.00 and instead "float" their NAV based on the mark-to-market value of their underlying investments is not conducive to maintaining stable financial markets. We are also concerned about the option to require the funds to be subject to bank-like regulation and capital reserves. Either option could impair the viability of money market mutual funds. This in turn could significantly curtail fund assets as a source of financing for businesses, and the availability of a well-diversified, stable \$1.00 NAV investment option with competitive returns for businesses.

In Utah and around the country money market mutual funds are an important source of financing and an important investment option for many businesses. In fact, as an industry, money market mutual funds purchase about 39% of all commercial paper. A number of regulatory and industry changes since 2008 have made the funds safer and more resilient to market disruptions, but regulators continue to evaluate further reforms.

As a type of mutual fund, "money market" mutual funds are one of the most highly regulated types of investment products. To further enhance the resiliency of money market mutual funds in the wake of the recent financial crisis, the Securities and Exchange Commission in January 2010 adopted significant amendments to Rule 2a-7 of the Investment Company Act, which governs money market mutual funds. More specifically, the Rule 2a-7 amendments have imposed requirements that significantly enhance the credit quality, diversity, maturity, and liquidity of the investments held in money market mutual funds. The changes also have improved fund governance, transparency, and operations.

For the above reasons we respectfully request that the SEC not adopt the proposals submitted by the PWG to regulate Money Market Mutual Funds.

Thank you for your consideration.

Sincerely,

Lane Beattie  
President and CEO