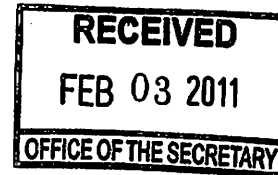




136 S. Bronough St.  
Tallahassee, FL 32301  
Phone: (850) 521-1200  
Fax: (850) 521-1203  
[www.floridachamber.com](http://www.floridachamber.com)



January 28, 2011

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

**Re: Florida Chamber Comments on the President's Working Group on Financial Markets**

Dear Ms. Murphy:

The Florida Chamber of Commerce, representing over 139,000 large and small businesses, employing over 3 million Floridians, is deeply concerned about the reform options presented by the President's Working Group on Financial Markets regarding money market mutual funds. Many Florida Chamber members rely on these funds for short-term funding and investment needs. However, the discussed change that would require money market mutual funds to maintain a floating Net Asset Value, rather than a stable \$1 per share as has been the standard, could drive investors out of these funds and once again cut off a crucial source of capital for Florida businesses. Furthermore, this change could reduce the viability of money market mutual funds as short term cash management tools for businesses, and force many companies into more volatile, higher-risk investments. In the midst of a still fragile economic recovery, businesses cannot afford more uncertainty in the financial markets or obstacles to financing.

If this suggestion is adopted, there is a high likelihood that the commercial paper market will be adversely affected. Florida businesses issue commercial paper to finance short term needs such as payroll, restocking inventories, and financing the expansion of their operations. Over 40% of the commercial paper issued by businesses in the United States is held by money market mutual funds, so a dramatic decrease in demand that could result from this change would increase costs to businesses and further hamper job growth.

In addition, many businesses use these funds on a daily basis as an essential part of their operations. This concept could destabilize money market mutual funds by causing as much as \$1 trillion to flow out of this asset class. Consequently, businesses will turn to riskier or more illiquid assets to manage their short term cash needs, needlessly disrupting daily operations and introducing a level of uncertainty that could only harm the management of their businesses.

Florida's unemployment rate remains at 12%, and Florida employers are struggling to regain a sense of normalcy to begin hiring again. Introducing higher costs and more uncertainty into their day-to-day operations is counterproductive and will short-circuit our state's economic recovery.

Ms. Elizabeth M. Murphy  
January 28, 2011  
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Thank you for the opportunity to provide these comments, and please contact me if you have any questions about our concerns.

My best,

A handwritten signature in black ink that reads "Mark Wilson". The signature is written in a cursive, slightly slanted style.

Mark Wilson  
President and CEO

/cmc