Ms. Elizabeth Murphy  
Secretary  
U.S. Securities Exchange Commission  
100 F Street NE  
Washington, DC 20549

Re: Proposed Rule on Money Market Fund Reform, Amendments to Form PF, File Number S7-03-13

Dear Ms. Murphy:

The undersigned organizations and businesses are writing to share our views on the Securities and Exchange Commission (“SEC” or the “Commission”) proposed rulemaking regarding money market mutual funds (“MMMFs”). We strongly urge the SEC to refrain from finalizing any mandates that would fundamentally alter the structure and nature of MMMFs—a vital, liquid cash management tool. Regulatory changes contained in the SEC’s proposed rulemaking—most notably the floating net asset value (“floating NAV”) requirement for institutional prime funds and attendant changes in accounting treatments—would significantly discourage many of us or the businesses we represent and other investors from using MMMFs and have reverberation that hampers economic recovery.

Since their inception in the 1970s, MMMFs have been an invaluable cash management tool for American businesses and increased the operational efficiency of these companies. This has not been by chance. By design, MMMFs have a number of attributes that make them an unparalleled cash management tool. MMMFs provide companies with access to an expertly managed, diversified portfolio of high-quality, short-term assets. Just as importantly, they are a stable-value investment that permits investors to redeem their investment instantly as needed.

Much attention has been focused on the complicated tax and accounting issues that need to be resolved in order to impose a floating NAV, and we do not want to diminish their importance. Nevertheless, regardless of the resolution of these issues, the simple fact is that most businesses will not invest their cash in a floating NAV MMMF. The modest returns from these
investments will not justify the commitment of time and resources needed to manage an investment program in MMMFs that have a floating NAV. In addition, the proposal eliminates the use of amortized cost accounting and penny rounding that allows for a stable net asset value, a defining characteristic of MMMFs. Without this valuation method, funds would need to go out into the market to determine the value of the assets they hold before redeeming shares. This would make immediate redemption challenging and destroy the most attractive attribute of MMMFs.

The implications of a migration away from MMMFs extend well-beyond cash management within individual companies. Cash that companies invest in MMMFs provide a critical source of capital used to buy corporate commercial paper and short-term municipal securities. If a floating NAV dries up this capital source, it will rob the commercial paper and short-term municipal securities markets of a major source of short-term financing and disrupt the operations of companies and municipalities across the country.

We urge the SEC to refrain from adopting a final regulation that incorporates regulatory mandates that will remove the key characteristics of liquidity and principal preservation that have made MMMFs valuable as a cash management tool. Regulatory changes that fundamentally alter the existing structure and characteristics of these funds would restrict short-term financing for businesses and municipalities, and hurt the American economy.

We thank you for your consideration.

Sincerely,

Airgas, Inc. Radnor, PA
Alert Stamping & Manufacturing Co., Inc. Bedford Heights, OH
Allegheny Technologies Incorporated Pittsburgh, PA
Alydar Agency, Inc. Islip Terrace, NY
Associated Industries of Florida Tallahassee, FL
Association for Financial Professionals Bethesda, MD
Association of Commerce & Industry of New Mexico Albuquerque, NM
Blyth, Inc.                Greenwich, CT
Brandywine Communications  Tustin, CA
Chicagoland Chamber of Commerce  Chicago, IL
Cincinnati USA Regional Chamber  Cincinnati, OH
Cross Diamond Electric  Parker, CO
Cruise Control Auto Care  Rifle, CO
Dallas Regional Chamber  Dallas, TX
Devon Energy Corporation  Oklahoma City, OK
Dominion Resources Inc.  Richmond, VA
Downey-Goodlein Elevator Corp.  Rochester, NY
Earl's Lawn Care  Middletown, PA
East Tennessee Section of AACE International  Knoxville, TN
Elite Marketing  Houston, TX
Elite Securities, Inc.  Houston, TX
Engineered Systems Inc.  Kailua, HI
Financial Executives International  Morristown, NJ
Florida Chamber of Commerce  Tallahassee, FL
FMC Corporation  Philadelphia, PA
Fort Worth Chamber of Commerce  Fort Worth, TX
Global Tooling Solutions, LLC  Norwood, MA
Great Plains Energy, Inc.  Kansas City, MO
Greater Boston Chamber of Commerce  Boston, MA
Greater Durham Chamber of Commerce  Durham, NC
Greater Irving-Las Colinas Chamber of Commerce  Irving, TX
Greater Pittsburgh Chamber of Commerce  Pittsburgh, PA
Greater Providence Chamber of Commerce  Providence, RI
Greater Raleigh Chamber of Commerce  Raleigh, NC
Greater Springfield Chamber of Commerce  Springfield, VA
HCA  Nashville, TN
Indiana Chamber of Commerce  Indianapolis, IN
Integrated Science Solutions, Inc.  Walnut Creek, CA
Joyco MultiMedia, LLC  Denver, CO
Kentucky Chamber of Commerce  Frankfort, KY
National Association of Corporate Treasurers  Reston, VA
Navistar  Lisle, IL
New Jersey State Chamber of Commerce  Trenton, NJ
Nissan North America, Inc.  Franklin, TN
Noble Energy, Inc.  Houston, TX
Outdoor Amusement Business Association, Inc.  Winter Park, FL
Pharmacy Solutions  Longview, TX
Regal Marketing Inc  Jupiter, FL
Retail Industry Leaders Association (RILA)  Arlington, VA
Ruan  Des Moines, IA
Safeway Inc.  Pleasanton, CA
South Baldwin Chamber of Commerce  Foley, AL
Telephone and Data Systems, Inc.  Chicago, IL
Texas Association of Business  Austin, TX
The Boeing Company  Arlington, VA
Time Warner  New York, NY
U.S. Chamber of Commerce  Washington, DC
Vulcan Materials Company  Birmingham, AL