TISHAURA O. JONES
TREASURER
CITY OF SAINT LOUIS
MISSOURI

September 17, 2013

The Honorable Mary Jo White
Chair
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090

Re: **Proposed Rule on *Money Market Fund Reform; Amendments to Form PF*; Release No. S7-03-13**

Dear Chair White:

We are writing as the Comptroller and Treasurer of the City of St. Louis to comment on the proposals to amend Rule 2-a7 (the "Rule") in further response to the financial crisis of 2008.

Like many other municipalities, St. Louis requires short-term investment vehicles that provide safety of principal and liquidity in order to manage its operations effectively. We appreciate the role of the Securities and Exchange Commission ("SEC") in helping to protect investors who rely on money market mutual funds. In particular, we support the 2010 amendments to the Rule which shortened weighted average maturity, strengthened credit, and for the first time required that funds maintain explicit daily and liquidity amounts to provide for unexpected redemptions.

The causes of the 2008 financial crisis were many; no single class of financial market participants caused it, and the regulators have rightly implemented a plethora of rules that apply to different financial institutions and products, including money market mutual funds. Although we generally support recent efforts by the SEC to regulate the market, the proposed money market fund reform contains several burdensome elements that will increase costs and reduce flexibility for the City of St. Louis without further reducing risk.

Specifically, the requirement that prime institutional money market funds operate with a floating net asset value will require that the City of St. Louis and other municipalities to either make expensive changes in accounting systems and reporting protocols or seek alternative investments that may have more risk and lower yields. The proposal that money market mutual funds apply redemption fees and gates will also imperil our ability to make payroll and bond payments. Thus, the proposals impose undue harm, not help to city budgets and operations.

1200 Market Street, Room 220 City Hall • St. Louis, MO 63103 • (314) 622-4700
Fax: (314) 622-3782 • Email: jonestj@stlouis-mo.gov • Website: www.stlouis-mo.gov/government/departments/treasurer

We respectfully suggest that the significant changes in money market fund operations required by the 2010 amendment along with the many other changes promulgated by regulators around the globe are sufficient to manage the risks that led to the 2008 crisis.

Sincerely,

Tishaura O. Jones
Treasurer

Darlene Green
Comptroller