

Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Request for Extension of Comment Period - Financial Data Transparency Act, File No. S7-2024-05

Dear Ms. Countryman,

The organizations listed below, collectively representing members of the Public Finance Network, represent state and local governments, governmental entities, authorities, and issuers of municipal securities. As representatives of a diverse coalition of public finance stakeholders, we not only believe it is imperative that all perspectives are considered during the rulemaking process for the Financial Data Transparency Act, but also understand it is a requirement as articulated Sec. 5823 "The Commission shall consult market participants in data standards."

We write to respectfully request a 60-day extension of the comment period for the proposed rules implementing the Financial Data Transparency Act (FDTA). This extension is crucial to allow stakeholders sufficient time to thoroughly analyze and provide meaningful feedback on these complex and far-reaching proposals.

The proposed rules represent a significant shift in financial data reporting and transparency, with wide-ranging implications for various market participants. The complexity and potential impact of these changes are evident in the various statements and remarks made by Securities and Exchange Commission (SEC) Commissioners, which highlight several critical concerns and underscore the need for careful consideration.

Commissioner Peirce's statement¹ emphasizes the broad scope of the FDFTA, noting that it affects not only the SEC but also other financial regulators. She raises important questions about the potential consequences of standardizing financial data across diverse entities and the challenges of implementing a "one-size-fits-all" approach. These concerns merit in-depth analysis and discussion among affected parties.

Similarly, Commissioner Uyeda's statement² points out the significant technological and operational changes that would be required to implement the proposed rules. He highlights the potential burden on smaller entities and questions whether the benefits of the proposed changes outweigh the costs. These are complex issues that require careful evaluation and input from a wide range of stakeholders.

¹ Data Beta: Statement on Financial Data Transparency Act Joint Data Standards Proposal
Commissioner Hester M. Peirce, available here: <https://www.sec.gov/newsroom/speeches-statements/peirce-statement-financial-data-transparency-act-080224>, August 2, 2024.

² Statement on Financial Data Transparency Act Proposed Joint Data Standards, Commissioner Mark T. Uyeda, available here: <https://www.sec.gov/newsroom/speeches-statements/uyeda-statement-financial-data-transparency-act-080224>, August 2, 2024.

Further, Commissioner Jaime Lizárraga's remarks³ at the 2023 SEC Municipal Securities Disclosure Conference provide additional context for the implementation of the FDTA. He emphasized the importance of the municipal securities market and its impact on retail investors, noting that 40% of outstanding municipal bonds were held by individual investors at the end of 2022. He stressed the importance of stakeholder engagement in the rulemaking process.

Given the intricate nature of the proposed rules and their potential far-reaching effects, a 60-day extension of the comment period would allow for:

- A more comprehensive analysis of the proposed changes and their implications.
- Consultation with technical experts and affected parties.
- Assessing relevant data to support or challenge aspects of the proposal.
- Formulation of usable and constructive feedback.

This timeline and the Commissioners' encouragement for stakeholder participation further underscore the complexity of the proposed rules and the need for thorough analysis and input from affected parties. We believe that this extension will ultimately benefit the rulemaking process by ensuring that the SEC receives thorough, well-considered comments that can contribute to the development of effective and balanced regulations.

Thank you for your consideration of this request. Issuers of municipal securities look forward to participating in this important regulatory process.

Sincerely,

Government Finance Officers Association, Emily Swenson Brock, 202-393-8467

American Public Gas Association, Joshua St. Pierre, 202-407-0015

National Association of College and University Business Officers, Ashley Jackson, 202-861-2522

National Association of Counties, Paige Mellerio, 202-942-4272

National Assoc. of Health and Educational Facilities Finance Authorities, Chuck Samuels, 202-434-7311

National Association of State Auditors, Comptrollers and Treasurers, Cornelia Chebinou, 202-624-5451

National Association of State Treasurers, Dillon Gibbons, 202-347-3863

National Special Districts Coalition, Ann Terry, 303-863-1733

³ Remarks at the 2023 SEC Municipal Securities Disclosure Conference, available here: <https://www.sec.gov/newsroom/speeches-statements/lizarraga-remarks-2023-municipal-sec-disclosure-conference>, Commissioner Jaime Lizárraga, May 10, 2023.