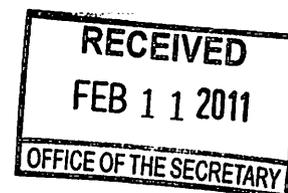




February 10, 2011

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



Subject: SEC Ruling, file Number S7-45-10 ("municipal advisor")

Dear Secretary Murphy:

I am writing this letter as the Executive Director of the West Calcasieu Port which is located on the Gulf Intracoastal Waterway in Southwest Louisiana. The port was created by the Louisiana Legislature (Act No. 68) in 1964, creates jobs, serves the Calcasieu Parish and provides essential services that support the vibrant shallow-water maritime industry along the Gulf of Mexico.

On behalf of the West Calcasieu Port and its Board of Commissioners (Board), I respectfully request that the Securities & Exchange Commission carefully review the SEC proposed Rules 15Ba1 to 15Ba7 (the "Rule"), and revise its interpretation of the definition of the term "municipal advisor" to exclude appointed as well as elected board members of ports. Under the proposed "Rule", an appointed board member of port boards would be required to register as a "municipal advisor" while an elected board member is excluded from registering.

Requiring citizen volunteers to submit to SEC reporting and be subject to a heightened fiduciary obligation would have the unintended consequence of discouraging their participation in a very important segment of our economy. Board members (5) of the West Calcasieu Port receive a per diem of \$100 per month to cover expenses of attending meetings and the reported fee of \$600 for registering will cause many of our board to discontinue their service to our public entity facility.

Members of the West Calcasieu Port board of commissioners are dedicated and committed members of the community in the western portion of Calcasieu Parish. They are treated as public officials. They are appointed by a variety of entities in our community. Additionally, during the confirmation process, they are subject to considerable scrutiny. Our port is required to have independent audit which is reviewed and approved by the Louisiana Legislative auditor.

PO Box 1538 ■ Sulphur, LA 70664
Phone: 337.794.4809



In Louisiana, all proposed public borrowing is first subject to approval by the Board, (and parish council) then approval of the Louisiana Bond Commission, a constitutional agency comprised of elected officials, which investigates the financial soundness of the proposal which includes a review of the recommendations of the board's professional financial advisor, many of whom are already subject to SEC and other regulations.

We suggest that rather than discouraging participation on governing boards by requiring registration and additional potential liabilities, the SEC should encourage greater participation of individuals knowledgeable and experienced in finance. The potential for the "municipal advisor" requirements to attach being dependent upon whether "advice" is given by a board member would have a chilling effect on board members expressing their views.

Thank you for considering our views.

Respectfully,



Lynn E. Hohensee

Port Director