

**THE INDUSTRIAL DEVELOPMENT AUTHORITY
OF THE
CITY OF YUMA, ARIZONA
P.O. Box 6446
Yuma, Arizona 85366-6446**

January 24, 2011

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

Re: File Number S7-45-10
SEC proposal to require officers of governmental entities to register as "municipal advisors"
Release 34-63576

Dear Chairman Schapiro and Members of the Commission;

I am writing to comment on the exclusions from the definition of "municipal advisor" as proposed in Release 34-63576 concerning registration of municipal advisors that fails to exempt appointed local government officials from the definition of "municipal advisor". The Commission's proposal overreaches, misunderstands basic principles of local government law, and will have a negative effect on local government budgets and their operations.

In Yuma, Arizona, the City Council appoints five (5) citizens to the Board of Directors of the Industrial Development Authority of the City of Yuma, Arizona ("IDA"). These are unpaid volunteers who perform a valuable service for the community. The IDA receives and processes applications for issuance of Industrial Revenue Bonds, complies with the Arizona Statutes and Internal Revenue Code, conducts public hearings and makes recommendations to the City Council by adopting a "bond resolution." The City Council is the final approving authority for the bond issue. To consider the Board members of the IDA "municipal advisors" and subject to registration and regulation is an outrageous imposition of unnecessary governmental control.

The cost to the City of Yuma to comply with this regulation will be extensive and comes at the worst time for the City. The City will be required to pay the cost for registering municipal advisors who serve the local government in a volunteer capacity and for those who are its officials. In addition, the City will need to hire counsel with expertise in dealing with the SEC to be sure that these officials are properly trained and advised in the intricacies of securities law, without reducing the expense for counsel and various advisors who in the past have handled issues on behalf of the City.

I ask that you consider expanding the exclusion for local government officials, including among them, appointed board members and other elected and appointed officials that may advise "municipal entities," from the requirement to register as "municipal advisors" by including them within the definition of "municipal employee."

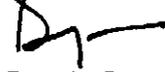
Your consideration would be consistent with our President's editorial in the January 18, 2011, issue of the Wall Street Journal that ends with the following passage:

"This is the lesson of our history. Our economy is not a zero-sum game. Regulations do have costs; often, as a country, we have to make tough decisions about whether those costs are

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necessary. But what is clear is that we can strike the right balance. We can make our economy stronger and more competitive, while meeting our fundamental responsibilities to one another.”

Respectfully,

A handwritten signature in black ink, appearing to read 'Dan A. Gray', with a horizontal line extending to the right.

Dan A. Gray, President

cc: Barack Obama, President, United States of America
Congressional Delegation
Directors, Industrial Development Authority of the City of Yuma
City of Yuma Mayor and Council
Yuma City Administrator