

To whom it may concern:

I am a community banker in Western Oklahoma and I am concerned that the proposed Registration of Municipal Advisors rules for 17 CFR Parts 240 and 249 will inadvertently force community banks to register with the SEC when we hold checking accounts for our local municipalities, offer cash management products to our local municipalities, make loans to any municipal entity during the normal course of business, provide municipal letters of credits when required or even volunteer on a City committees. I do not believe this is the intent of these proposed rules. I respectfully request, therefore, that the term "advice", be clearly defined in the proposed regulation.

The Dodd-Frank statute talks about "proceeds" of municipal securities, however, the proposed rule does not mention nor define the term thereby expanding coverage to an unlimited amount of products, services, instances of contact or even conversations. Again, I respectfully request that the term "proceeds" be clearly defined in the proposed regulation.

In small communities across our nation, it is imperative that the local bank be able to service the banking needs of its municipalities and serve as needed on its committee. In my opinion, it is the intent of this proposal to better regulate dealings with Municipal securities and not normal bank operations, therefore, I request that you give thoughtful consideration to better defining the coverage of its rules.

I thank you in advance for your consideration of this e-mail. I believe it is important for us to work together so rules and regulations approved are effective and apply only as intended.

Sandra K-H Werner
CEO
First National Bank & Trust