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February 22, 2011

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

RE: SEC Proposed Rule 34-63576

Dear Ms. Murphy:

I am writing with great concern about the SEC's definition of who is a municipal financial advisor under SEC Proposed Rule 34-63576.

I am a member of the State of Idaho Endowment Fund Investment Board. I was appointed by the Governor and confirmed by the Idaho Senate.

I am opposed to the SEC's proposal to consider appointed members of state and local government governing bodies as financial advisors. A state or local government governing board, comprised of appointed members, cannot serve as an advisor to itself.

Your proposed definition that an appointed board member becomes a "financial advisor" merely as a result of the appointment is contrary to the notion of a citizen government. Appointed members of governing bodies, especially at the local level, typically are citizen volunteers who are interested in serving for the public good and often have special expertise that is critical to the effective functioning of the governing body. However, I and others like me will be deterred from serving on state and local governing boards if federal securities regulations are imposed upon us, which means the boards would lose valuable insight and ultimately become composed of state employees only.

The SEC's proposed rule exempts elected members, elected ex-officio, and employees of a municipal entity's governing board from the definition. However, as a lay member, I suddenly become a "financial advisor" who would be subject to and have to register with the SEC, and meet various regulatory requirements set forth by both the SEC and the MSRB, including registration requirements and fees, federal fiduciary standards, federal securities law liabilities, and federal financial disclosure standards. My civil and political contributions may also be restricted.

Page 2

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I support the registration of financial advisors who are financial advisors. You already register them and they receive compensation for services or advice or receive fees for participating in bond underwritings. They are restricted from political donations, etc., because they have conflicts and they choose to be engaged in that business. However, that is not the case of an Endowment Board member or similarly appointed laypersons. Our local rules do not allow such conflicts and the proposed burden of registration does not provide any more protection.

I urge the SEC to exclude all governing body members and the employees of appointed bodies, including those who serve across jurisdictional boundaries, from the municipal advisor definition.

If Congress had intended for appointed members of governing bodies to be included within the municipal financial advisor definition, it would have made this point clear in the statute. By excluding all governing body members and the employees of appointed bodies from the municipal advisor definition, we will retain the expertise our board needs to make important decisions for our constituents.

Thank you for the opportunity to comment on the SEC's Proposed Rule 34-63576.

Sincerely,



R. John Taylor

President, CropUSA Insurance Agency, Inc.

Member of the Board of Directors
State of Idaho Endowment Fund Investment Board

cc: Senator Mike Crapo
Senator James Risch
Congressman Raul Labrador
EFIB