



February 22, 2011

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

Delivered by Electronic Mail: [rule-comments@sec.gov](mailto:rule-comments@sec.gov)

**RE: Registration of Municipal Advisors (RIN 3235-AK86) (File Number S7-45-10)**

Dear Ms. Murphy:

The Housing Authority of the City and County of Denver ("DHA") joins the comment letter submitted to the Commission on February 18, 2011, by the Colorado Health Facilities Authority, the Colorado Housing Finance Authority and the Colorado Educational and Cultural Facilities Authority (the "Authorities' Letter"). In addition to the concerns raised in the Authorities' Letter, another significant concern associated with categorizing appointed board members as "municipal advisors" is either increased insurance costs to municipal entities or the complete inability to obtain such insurance coverage. Generally, liability insurance policies covering public officials, such as board members, do not cover any actions of such board members in their roles as "municipal advisors." For example, the Special Exclusion section of the public officials insurance policy maintained by DHA specifically excludes financial and investment activities of the public officials, including the board members.

Accordingly, assuming that such coverage is even available, municipal entities will have to incur additional costs to obtain appropriate liability insurance coverage for their board members. The costs of additional insurance coverage could be significant, especially when added to other costs associated with the registration and maintenance of a "municipal advisor" status. If the appropriate insurance coverage is not available, it will make it more difficult for municipal entities to attract and retain qualified individuals to serve on their boards.

Thank you in advance for your consideration of our comments. If you have any questions please feel free to contact me at 720.932.3105 or [iguerr@denverhousing.org](mailto:iguerr@denverhousing.org)

Sincerely,

A handwritten signature in black ink, appearing to read 'Ismael Guerrero', with a long, sweeping flourish extending to the right.

Ismael Guerrero  
Executive Director

cc: Mayor's Jack Finlaw, Chief of Staff/Suzan Moore, Office of the Mayor – Director of Boards and Commissions/Crawley-DHA Legal Counsel/BOC/File