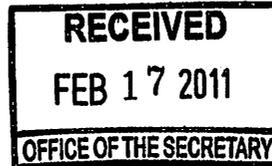




**Commissioners**  
Phil Bell  
Calvin L. Deshotel  
John Lockett  
Lennel G. Paul  
Willie Peters  
Ralph Longman  
Wayne Stevens  
Will Terry

**Executive Director/President**  
Albert H. Blevins, Jr.

**Special Assistant**  
David J. Allain



February 9, 2011

Ms. Elizabeth M. Murphy, Secretary  
Securities and 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 Port of West St. Mary which is located on the Gulf Intracoastal Waterway. The port was organized in 1974 creates jobs and serves St. Mary Parish. The Port of West St. Mary primarily handles Oilfield cargo.

On behalf of the Port of West St. Mary and its Board of Commissioners, I respectfully request that the SEC 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. Port Board Members **do not receive per diem** and the reported \$600 for registering will cause many of our board to discontinue their service to our community.

Our Port Commissioners are members of the community and are treated as public officials. They are appointed by the City/Parish, subject to removal for cause, and serve limited terms. Our Port is required to have an independent audit which is reviewed and approved by the Louisiana Legislative auditor.

In Louisiana all proposed public borrowing is first subject to approval by the Board and then must also be approved by the Louisiana Bond Commission, a constitutional agency comprised of elected officials. The Bond Commission 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.

Yours Truly,

  
Albert H. Blevins, Jr.  
Director/President  
PORT OF WEST ST. MARY

/dl