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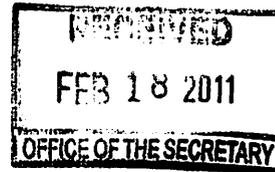
The First National Bank of Suffield

"YOUR HOMETOWN BANK"
Established 1864

George W. Hermann
President / CEO

February 17, 2011

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090
Re: File Number S7-45-10



Dear Elizabeth Murphy:

We appreciate the opportunity to comment on the notice of proposed rulemaking issued by the Securities and Exchange Commission to establish a permanent registration system for municipal advisors under Section 975 of the Dodd-Frank Act.

The First National Bank of Suffield is a 146 year old community bank with \$210 million in assets. We have deep roots in the communities that we have offices in. The economic health of the towns where we have offices has been good in no small part due to the fact that we all support each other by doing business locally. We provide basic depositary services to several municipalities in our market. We may also provide loans to quasi-public agencies such as the construction loan we provided to the ambulance service to help construct a new ambulance garage. We are the local institution that provides the municipal employees a place to cash their paychecks regardless of whether they are a customer or not.

Section 975 was intended to establish a regulatory scheme for unregulated persons providing advice to municipalities with respect to municipal derivatives, guaranteed investment contracts, investment strategies or the issuance of municipal securities.

The SEC has expanded the definition of "investment strategies" to encompass any funds "held" by a municipal entity, regardless of whether such funds are related to the issuance of municipal securities or investment of bond proceeds.

The SEC's interpretation would cover traditional bank products and services such as the ones we offer to the municipalities in our market. This means that banks like ours would have to register as municipal advisors and add a new layer of regulation on bank products for no

meaningful public purpose.

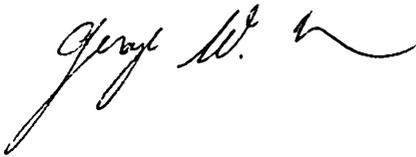
This duplicate regulation will raise costs and limit availability of financial services, ultimately harming the local governments and the residents of those local communities. In our local community the municipal deposits are lent out in the form of loans to small businesses and individuals.

The Commission should state clearly that neither Section 975 nor its implementing regulation reach traditional bank products and services.

The Commission should extend the exemption for registered investment advisers to banks that are exempt from Investment Adviser Act registration.

This proposal conflicts with President Obama's initiative to avoid regulation that impedes economic growth and job creation.

Sincerely,

A handwritten signature in black ink, appearing to read "George W. Bush", with a stylized flourish at the end.