



March 7, 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 Authorized Agent of the West Cameron Port Authority (and associated East Cameron Port) which is located on the Calcasieu River Ship Channel and its companion Loop and East Fork. The port, organized in 1968, is an emerging port with waterfront landholdings that are striving to be a key economic development engine for both Cameron Parish and the entire Southwest Louisiana region.

On behalf of the West Cameron Port Authority, 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 a per diem and the reported fee of \$600 for registering will cause many of our board to discontinue their service to our community.

The Board of our port authority are members of the community and are treated as public officials, are appointed by the Police Jury, subject to removal for cause, serve limited terms, subject to confirmation by the Governor and the Louisiana Senate. Additionally, during the confirmation process, they are subject to a background investigation by the Louisiana State Police. 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, Police Jury, then approval of the Louisiana Bond Commission, a constitutional agency comprised of elected officials, which 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

A handwritten signature in black ink, appearing to read "Ernest Broussard", written over a circular stamp or mark.

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