

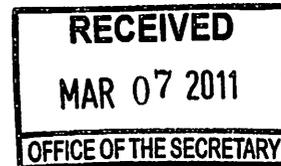
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Elizabeth M. Murphy
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090



RE: File No. S7-45-10

February 28, 2011

Dear Ms Murphy,

It has come to our attention that our employees and board of trustees may be subject to SEC regulation as "municipal advisors" when acting for, or advising the institution in a municipal revenue bond transaction or related investing or hedging activity. We urge the SEC to exclude members of the governing boards and employees of private, nonprofit colleges and universities from the definition of "municipal advisor" for numerous reasons described by others [including the National Association of Health and Higher Educational Facilities Authorities]. In our role as a 'pass through' issuer, we are offering advice only to ourselves since the underlying bonds are our obligations through the documentation process. We do not think that the regulation of "municipal advisors" is intended to cover this narrow situation. We believe state laws, our corporate bylaws and good governance practices are already in place to guide standards of conduct and address possible conflicts of interest.

Sincerely,

David Wheaton
Vice President for Administration and Finance