

June 8, 2011

The Honorable Mary L. Schapiro
Chairman
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Dear Chairman Schapiro:

We the undersigned bankers, representing banks of all charter types, sizes, and geographies, and from every State in the Union, write to express our deep and continuing concern about the Securities and Exchange Commission's (SEC) proposal for the registration of municipal advisors. We believe the proposal goes well beyond what is required either by the statute or the problems that the statute was written to solve. In doing so not only would it subject banks to yet one more layer of regulation for the same activities, but it would increase the cost and reduce the availability of financial services for local municipal governments and other municipal operations, including municipal hospitals, housing authorities, and school districts, among others.

As proposed, the rule would label as "municipal advisors" banks and many bank employees providing essential and traditional bank services to their local municipalities, including day-to-day deposit, cash management, custody, trustee and lending services – a result we do not believe furthers any legitimate policy goal and, as a recent letter from House Financial Services Committee Chairman Spencer Bachus explained, is not what Congress intended. If finalized in its proposed form, the rule would result in tens of thousands of bank and banker registrations, major new compliance costs, along with additional, redundant layers of multiple rules by the SEC and Municipal Securities Rulemaking Board (MSRB) for the very same products and services for which we are already comprehensively supervised by the prudential banking regulators.

We draw your attention particularly to the impact on our local municipalities. While we are all deeply involved in the life and activities of our communities, the unavoidable effects of the proposal would interfere with our ability to offer the services that we are accustomed to providing and upon which our municipalities rely. One example is symptomatic of others: the MSRB has proposed as part of its accompanying rule that an advisor could not provide products as a principal to a municipality it is advising. This blanket prohibition would prevent a bank from offering any deposit products to a municipality that it, or an affiliate, advises. It is hard to overestimate the hardship this one provision may cause for our local municipalities.

We renew our recommendation that the rule state clearly that banks and bankers providing traditional banking products and services are not required to register as

municipal advisors. Further, banks should be granted the same exemption from municipal advisor registration as registered investment advisers are for comparable advisory activities. No supervisory gap would be created by this approach: the prudential banking regulators today comprehensively supervise and examine banks with respect to all of their activities to all types of customers, including municipalities.

Thank you for your attention to this important matter.

Respectfully,

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Bank of Laverne
Laverne, OK

John Huston
Wood & Huston Bank
Marshall, MO

Nancy E. George
Girard National Bank
Girard, KS

Dean L. Friesen
Beacon Bank
Shorewood, MN

Chris Eckstein
South Side Trust & Savings Bank of
Peoria
Peoria, IL

Doug Tippens
Bank of Commerce
Yukon, OK

Cindy Daluisio
TOWNEBANK
Suffolk, VA

Mark A. Zaruba
First State Bank of Wyoming
Wyoming, MN

Andrew T. Kloeckner
Merchants Bank
Burlington, VT

Bill Scholl
First Security Bancorp
Little Rock, AR

Rick Harms
Great Western Bank
Omaha, NE

Teresa Rosengarten
Baylake Bank
Sturgeon Bay, WI

Laurie D. Grabow
Old Point National Bank
Hampton, VA

Jeffrey R. Schmid
Mutual of Omaha Bank
Omaha, NE

Darrell L. Grogan
First State Bank of Forsyth
Forsyth, MT

James E. Reilly
TD Bank, N.A.
Cherry Hill, NJ

Barry C. Elswick
TruPoint Bank
Grundy, VA

Kris Gardner
Alpine Bank
Glenwood Springs, CO

Timothy Jewell
Eaton Federal Savings Bank
Charlotte, MI

Jim Cronin
Dime Bank
Norwich, CT

Charles J Boulier, III
Naugatuck Savings Bank
Naugatuck, CT

Larry G. Dillon
Citizens and Farmers Bank
West Point, VA

James R. Neill
Macon-Atlanta State Bank
Macon, MO

Duane R. Schieffer
Cedar Security Bank
Fordyce, NE

Belvia Bourland
Sycamore Bank
Senatobia, MS

Kenneth D. Gibbons
Union Bank
Morrisville, VT

James R. Shaw, Jr.
Mountain Valley Community Bank-
Jackson County
Jefferson, GA

Stephen J. Steiner
North Shore Bank
Brookfield, WI

Wanda Anderson
First Interstate Bank
Billings, MT

Paul E. Fitzgerald
First Bank
Hamilton, NJ

Eric A. Gardey
Alpine Bank
Glenwood Springs, CO

Copper W. France
Bank of Commerce
Rawlins, WY

Kent Townsend
Capitol Federal Savings Bank
Topeka, KS

Keith Cure
Security Bancshares, Inc.
Scott City, KS

Steve Sallenbach
First National Bank
Wahoo, NE

Aaron K. Veatch
Emprise Bank
Wichita, KS

Kimbol R. Rowland
Western National Bank
Scottsdale, AZ

Marty W. Hansen
First State Bank
Fairfax, OK

Joel Clements
First State Bank
Waynesboro, MS

Mark S. Goehring
The Farmers State Bank
Oakley, KS

Pat Myrick
Mile High Bank
Denver, CO

Scott A. McCarty
The Bath State Bank
Bath, IN

John E. Doffing
First State Bank of Wabasha
Wabasha, MN

Larry B. Watson
BancorpSouth
Hattiesburg, MS

Craig Ingham
Mt. McKinley Bank
Fairbanks, AK

Sherry Gerlach
First Dakota National Bank
Parkston, SD

Grant Seaman
First State Bank
Warner, SD

Jerry S. Elkins
Bank of Moundville
Moundville, AL

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Enid, OK

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East Wisconsin Savings Bank
Kaukauna, WI

Edward K. Johnstone
KSB Bank
Keokuk, IA

Patricia Riley
Oregon Pacific Bank
Florence, OR

Everett D. Knight
Banterra Bank
Eldorado, IL

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Beverly Maxfield
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Patrick D. Millar
Evan Klaras
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Old Florida National Bank
Winter Park, FL

Kent Redfern
Bank & Trust Company
Litchfield, IL

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First Intersate Bank
Helena, MT

Barry B. White
Joe Reeves
Marie E. McGrew
Roseann G. Williams
Michael L. Ayer
Lynn Ross
Joanna Chandler
N. Houston Parks
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First Farmers & Merchants Bank
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Cypress Bank
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United Bank
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Aliant Bank
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Alvin R. McElfresh
Haddon Savings Bank
Haddon Heights, NJ

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PriorityOne Bank
Magee, MS

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The Bank of Southside Virginia
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Joey Bleak
State Bank of Southern Utah
Cedar City, UT

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Littleton, NH

Paul J. Thompson
Lori Napravnik
Country Club Bank
Kansas City, MO

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Bank of Alpena
Alpena, MI

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Charter Financial Corporation
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First State Bank Central Texas
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Citizens Bank
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Texas Bank
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Panola National Bank
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Legend Bank
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Jeff Moore
Dacotah Bank
Dickinson, ND

Dean Steinwand
Citizens State Bank Midwest
Cavalier, ND

Brian Johnson
Choice Financial
Grafton, ND

Davie Hanson
American State Bank and Trust Co
Williston, ND

Charles Stroup
Union State Bank of Hazen
Hazen, ND

Dave Johnsen
Dacotah Bank
Valley City, ND

Todd Humphrey
Starion Financial
Bismarck, ND

Tom Stennes
Harwood State Bank
Harwood, ND

Greg Schwab
Northland Financial
Steele, ND

Gary Petersen
Lakeside State Bank
New Town, ND

Brent Zavalney
Choice Financial Group
Langdon, ND

Vaune Cripe
American Bank Center
Dickinson, ND

Mark L. Jones
Ralph Manoushagian
K. Wayne Lee
First Financial Bank Southlake
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Jim R. Purcell
Franklin E. Weber
State National Bank of Big Spring
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Robert K. Baen
Janine Hartman
First State Bank
Uvalde, TX

Robert Harrison
First Hawaiian Bank
Honolulu, HI

Troy Lambden
Graham Savings and Loan, FA
Graham, TX

Ivan Olson
The Bank & Trust of Bryan/College
Station
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Marla Geib
The Murray Bank
Murray, KY

C. R. Vacek
CommunityBank of Texas N.A.
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Clyde Birch, Jr.
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Christine Amos
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