

# Big Bend Partnership Ltd.

February 9, 2011

Elizabeth M. Murphy, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549-1090  
[rule-comments@sec.gov](mailto:rule-comments@sec.gov)

RE: FILE **S7-45-10**

Dear Secretary Murphy:

I am writing this letter as a member of the board for the Spring Branch Management District, in Houston, Texas. Our board is composed of citizen volunteers appointed by our City Council to help carry out the mission of the Spring Branch Management District's 10 year service plan. <http://sbmd.org/serviceplan.html> Our mission is to positively impact Public Safety, Economic Development, Environmental and Urban Design, and Mobility and Transportation to help create an environment attractive to business, to facilitate profitability, and to promote the redevelopment and growth of the area. For many of our members serving on a city Board or Commission is our first exposure to public service and we come from all walks of lives including engineers, accountants, homemakers, software specialists and small businessmen. We are not financial experts but we do reflect the values and priorities of our community.

I am therefore writing to express deep concern regarding the SEC's proposed Rules 15Ba1-1 to 15Ba1-7, which do not exclude appointed board members such as committee members from the definition of "Municipal Advisors". We are particularly concerned that our involvement with budgeting for the SBMD that may qualify as providing advice on the structure, timing, terms and other similar matters concerning the funding of capital improvements. This definition is much too broad and could have the unintended consequences of both flooding the SEC and MSRB with meaningless and unneeded registrations as well as creating an intimidating requirement for average citizens who simply want to serve their community.

Thanks you for consideration of my input.

Sincerely,

***Rino Cassinelli***

Rino Cassinelli  
President  
CK Big Bend Partnership LLC, general partner  
Big Bend Partnership Ltd.  
Board Member of the Spring Branch Management District