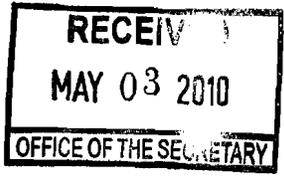


April 23, 2010



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

Re: Comment letter on Release No. 34-61793; File No. SR-MSRB-2010-02

Dear Secretary Murphy:

Reference is made to the comment letter submitted today by the Securities Industry and Financial Markets Association ("SIFMA") with respect to the above captioned Notice.

Representatives of BMO Capital Markets GKST Inc. participated in the formulation of the SIFMA comment letter. We are an active participant in the short-term municipal market as a remarketing agent for a significant number of VRDO issues. We strongly support the content and the conclusions of the SIFMA letter. We are especially concerned about the impracticality of the proposals and their attendant costs and burdens imposed on a broker-dealer community that has limited, if any, access to much of the material proposed to be required to be furnished.

Thank you for the opportunity to comment.

Very truly yours,

Robert J. Stracks
Counsel