

RECEIVED

NOV 1 5 2013

OFFICE OF THE SECRETARY

BMO Capital Markets GKST Inc. 115 South LaSalle Street 37th Floor Chicago, IL 60603

Tel: (312) 845-2000

November 9, 2010

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

Re: File Number SR-MSRB-2010-10

Dear Ms. Murphy:

Our firm participated in the discussion and formulation of the response submitted today by the Securities Industry and Financial Markets Association ("SIFMA").

We fully concur in the opinions and conclusions set forth in the SIFMA letter.

a programme de la grandia de la companie de la com

the grade production and an appropriate parameter and appropriate and appropriate parameter and appropriate appropriate and appropriate appropriate and appropriate appropriate and appropriate appropriate appropriate and appropriate appropriate appropriate and appropriate appropriate appropriate appropriate appropriate appropriate ap

Thank you for the opportunity to comment.

Very truly yours,

Robert J. Stracks

Counsel

RJS/mlm