

March 5, 2013

Ronald W. Smith  
Corporate Secretary  
Municipal Securities Rulemaking Board  
1900 Duke Street, Suite 600  
Alexandria, VA 22314

Via Securities and Exchange Commission Electronic Comment Filing System  
<http://www.sec.gov/cgi-bin/ruling-comments>

Re: File Number SR-MSRB-2013-01; Self-Regulatory Organizations; Municipal Securities Rulemaking Board; Notice of Filing of a Proposed Rule Change Relating to Amendments to MSRB Rules G-37 and G-8 and Form G-37

Dear Mr. Smith:

The Sunlight Foundation is a non-profit, nonpartisan organization that uses the power of the Internet to catalyze greater government openness and transparency. We are committed to improving access to government information by making it available online, redefining “public” information as meaning “online.” We also encourage government policies facilitating searchable, sortable, and machine-readable databases, engaging in advocacy for 21st Century laws that make data available in real time. We strongly support the Board’s proposal to require public disclosure of additional information related to bond ballot campaign contributions made by certain individuals.

Improving public disclosure of bond ballot campaign contributions is fundamental to helping citizens be better informed about possible conflicts of interest and any “pay-to-play” schemes that might be occurring in the underwriting of municipal bonds. We applaud the Board for the proposed rule change and for recognizing the importance of requiring and sharing more detailed information in the public’s interest. While improved disclosures are certainly helpful to those in the municipal securities business, it also adds a layer of transparency for voters, who have a clear interest in understanding the context of the bonds approved for their communities. The public understanding of municipal bonds can be strengthened even more with two steps we propose here. We urge the Board to use this opportunity to further improve transparency and accountability by making municipal securities information available in an open, standardized electronic format and by using non-proprietary unique identifiers.

The creation of EMMA was in itself a great leap forward in attempting to provide public disclosure that meets 21st Century standards. To truly meet these standards, however, and to provide better access to the data housed in EMMA, the Board should consider the benefits of moving to an XML format. The SEC has already started the move to an XML format, XBRL, that is making its databases more structured and the data easier to reuse and analyze. This kind of transition is

consistent with the Board's stated goals, outlined in the Long-Range Plan for Market Transparency Products, of working toward enhanced EMMA access. This would specifically help with the goals of finding better ways to display information and enhancing the opportunities for reuse of data.

The second step the Board should take toward improved public disclosure is adopting non-proprietary unique identifiers for tracking companies, issuers, and securities. The current use of CUSIP numbers, a proprietary system owned by the American Bankers Association, limits opportunities for data reuse. Switching to a system of public, non-proprietary unique identifiers would free this data while still allowing users a method of tracking information across bonds, companies, and municipalities. Improved search functionality is another goal of the Board as stated in the Long-Range Plan, and non-proprietary unique identifiers would be one step toward this end. The CFTC and DTCC are already making regulations around the use of non-proprietary Legal Entity Identifiers (LEI). Following their lead and considering adoption of the LEI would be exactly the kind of strategic, long-term planning MSRB has itself said it must do.

We again applaud the Board for making rule changes that increase public disclosure in the municipal bonds arena, and hope that due consideration will be given toward incorporating the best practices in related data standards. This improved disclosure moves the municipal securities market along a path of transparency and accountability. We respectfully ask that the Board seize this opportunity and take the steps necessary to pursue a transparent system of online disclosure that embraces proven methods of sharing information that will better inform the public about this crucial matter for years to come.

Sincerely,

Ellen S. Miller  
Co-founder and Executive Director  
The Sunlight Foundation