



Kentucky Chamber
Uniting Business. Advancing Kentucky.

Dave Adkisson
President & CEO

January 31, 2012

The Honorable Mary Schapiro
Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Dear Chairman Schapiro:

I am writing on behalf of more than 2,700 members of the Kentucky Chamber of Commerce to express our concern over potential regulatory changes that would impact the viability of money market mutual funds.

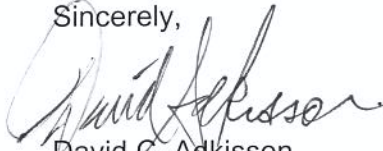
Whether it is a retailer stocking up for the holidays or a small manufacturer launching a new product, employers of all sizes and in nearly every industry have come to rely on money market funds as a safe and reliable way to meet their short-term capital needs. For many businesses, cash inflows and outflows don't always line up. Short-term financing needs such as purchasing inventory or hiring holiday help leave business owners in need of a safe, liquid investment that provides a reasonable rate of return. In turn, when companies find that their revenue surpasses their current expenses, the surplus cash is easily invested in a money market fund. These funds offer significant administrative efficiencies because of the stable \$1.00 per share value.

Understandably, money market funds have become a vital part of the short-term liquidity marketplace, supplying essential working capital to Kentucky businesses. Burdensome regulations that threaten the ease of use and reliability currently associated with these investments are also a threat to the successful role these funds play in our economy. In 2010, the SEC made revisions to Rule 2a-7 which strengthened money market funds' transparency and ability to withstand volatility in the marketplace. Additional changes to money market funds, such as mandating a floating NAV, capital requirements, or restrictions on redemption transactions would almost certainly lessen the viability and attractiveness of these funds. With money market funds as less attractive investment options, businesses may find moving funds offshore or to other less-regulated products as alternatives. This is hardly consistent with efforts to reduce risk, increase market transparency and ensure greater market stability.

As the largest business organization in Kentucky, we ask you to thoroughly evaluate the effect that any proposed changes to money market funds could have on American employers' ability to grow jobs. The current regulatory structure has provided businesses a stable, safe and

reliable option in money market funds. Before moving forward with any regulatory changes, please consider how this might affect the utility of money market funds and our greater economy.

Sincerely,

A handwritten signature in black ink, appearing to read "David Adkisson". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Adkisson".

David C. Adkisson
President & CEO

cc:

The Honorable Timothy Geithner, Secretary of the Treasury
The Honorable Ben Bernanke, Chairman, Federal Reserve Board
The Honorable Martin Gruenberg, Acting Chairperson, Federal Deposit Insurance Corporation
The Honorable Gary Gensler, Chairman, Commodities Futures Trading Commission
The Honorable Debbie Matz, Chairman, Credit Union National Administration
The Honorable Edward DeMarco, Acting Director, Federal Housing Finance Agency
Mr. John Walsh, Acting Comptroller of the Currency, Office of the Comptroller of the Currency
The Honorable Roy Woodall, Independent Member of Financial Stability Oversight Council