



COLORADO  
COUNTY  
TREASURERS'  
ASSOCIATION

Ms. Elizabeth Murphy  
Secretary Securities and Exchange Commission  
100 F St., N.E.  
Washington, DC 20549-1090

Dear Ms. Murphy,

The Colorado County Treasurer's Association does not support the proposed changes to Money Market Funds that would require them to report a floating Net Asset Value. This change replaces the current, commonly understood stable \$1.00 NAV.

County Treasurers in Colorado are tasked to invest their respective county's fund portfolio. Colorado state statute is very clear and limiting regarding permissible investment vehicles that Treasurer's have to their avail. The statute ensures that only safe, relatively liquid investments may be used. One of the tools available is the subject money market funds.

Changing the current system of a stable \$1.00 NAV for money market funds could alter the nature of these products and eliminate or impede our ability to purchase these securities. We are not in favor of the removal of a secure investment option.

Sincerely,

John Lefebvre  
Association President

Cc: Congressman Ed Perlmutter  
Eric Bergman, Colorado Counties Inc.  
Michael Townsend, Charles Schwab & Co., Inc.

Colorado County Treasurer's Association  
c/o Weld County Treasurer's Office  
P.O. Box 458  
Greeley, CO 80632  
(970) 353-3845