ASSOCIATION OF COMMERCE AND INDUSTRY

June 22, 2011

The Honorable Scott Garrett
Chairman
House Financial Services Subcommittee on Capital Markets and Government-Sponsored Enterprises
U.S. House of Representatives
Washington, DC 20515

The Honorable Maxine Waters
Ranking Member
House Financial Services Subcommittee on Capital Markets and Government-Sponsored Enterprises
U.S. House of Representatives
Washington, DC 20515

Statement of the Association of Commerce & Industry on
The Subcommittee on Capital Markets and Government Sponsored Enterprises Oversight
Hearing on Issues in the Mutual Fund Industry

Dear Chairman Garrett and Ranking Member Waters:

The Association of Commerce and Industry serves as the statewide chamber of commerce. In this capacity, the Association represents employers in the state at the state and federal level. The Association's mission is to enrich the lives and prosperity of New Mexicans through a vibrant business climate built by effective advocacy and education.

We are pleased that the Subcommittee is holding this hearing to explore the issues facing mutual funds and their investors. We wish to register our concerns regarding proposed changes to the structure of money market funds, particularly our strong opposition to proposals that would force these funds to abandon their stable $1.00 per-share price and instead "float" their net asset values (NAVs).

Our members rely upon money market funds as powerful tools for managing cash. Since the financial crisis of 2007–2009, policymakers have made great progress in making money market funds even stronger. A few regulators and commentators, however, continue to advocate changes that would undermine the economic and investor benefits of money market funds by eliminating the stable $1.00 per-share price.

In our view, forcing money market funds to float their NAVs would harm investors, our members, and the broader U.S. economy. We thus strongly support maintaining the ability of money market funds to offer a stable $1.00 per-share value.

For investors, the stable NAV provides vital benefits. Investors purchase and redeem millions of dollars in money market fund shares every day. With a stable NAV, typically set at $1.00 per share, those investors are relieved of the burden of tracking gains or losses for tax or financial accounting purposes.

PO Box 9706 » Albuquerque, NM 87119-9706 » P. 505-842-0644 » F. 505-842-0734 » www.aci-nm.org » info@aci-nm.org

To force floating NAVs would take away these benefits while risking the following negative effects:

- **Hobbling cash management**. Like many others, our members operate under investment constraints that require them to keep cash balances in accounts or products with stable principal value. If money market funds were required to float their NAVs, business would simply no longer be allowed use these funds to manage cash. Alternative funds are less regulated, less secure, and less liquid.

- **Driving up the cost of doing business**. Businesses and other institutions use money market funds to hold excess cash for short periods of time. Floating the NAV would undermine the convenience and simplicity using money market funds for cash management by confronting businesses with new tax, accounting, and legal hurdles. The consequences of such a move would increase costs and affect all sectors of the U.S. economy.

- **Increasing the cost of financing.** Money market funds hold more than one-third of the commercial paper that businesses use to meet short-term obligation, such as funding payrolls, replenishing inventories, and financing expansion. If proposed reforms drive investors out of money market funds, the flow of short-term capital to businesses will be significantly disrupted.

- **Creating a financing gap**. Few immediate substitutes are available to fill the financing gap that would be created by a rapid shrinkage of money market funds. Even if banks could raise the new capital needed to meet corporate and municipal demand, the lending market would be less efficient and costs would rise. Alternative funds are less regulated, less secure, and less liquid.

To avoid these negative consequences, we believe that any further reforms for money market funds must preserve their fundamental features. As Treasury Secretary Timothy Geithner recently noted, any further changes to money market funds must be made “without depriving the economy of the broader benefits that those funds provide.”

Forcing the adoption of floating NAVs for money market funds would not add resilience, and it would destroy many economic benefits. We therefore oppose any proposals that would change the stable $1.00 value of money market funds.

ASSOCIATION OF COMMERCE AND INDUSTRY

We thank the Subcommittee for holding this hearing and for the work it is doing to address these issues.

Sincerely,

Beverlee J. McClure
President & CEO

CC: Chairman Spencer Bachus and Ranking Member Barney Frank