

January 15, 2013

Financial Stability Oversight Council
Attn: Amias Gerety
500 Pennsylvania Avenue, NW
Washington, DC 20220

**Re: Proposed Recommendations to the Securities and Exchange
Commission under Section 120 of the Dodd-Frank Act Regarding Money
Market Mutual Funds; Docket Number FSOC-2012-0003**

Dear Members of the Financial Stability Oversight Council:

The undersigned companies, chambers of commerce, non-profits, and organizations representing municipalities and industries of varying sizes across the United States, rely on money market mutual funds (MMMFs) to meet cash management and short-term financing needs. We write today to express our concerns regarding the Financial Stability Oversight Council's (FSOC) proposed recommendations for money market mutual funds reform under Section 120 of the Dodd Frank Act.

MMMFs serve two essential purposes for businesses, municipalities, and non-profits. First, the funds are a low-risk and liquid investment vehicle. Money market mutual funds provide a menu of benefits, such as the ability to diversify, strong credit analysis, and high-quality assets of limited duration, that cannot be replicated anywhere else in the market. Second, MMMF's hold more than one-third of outstanding commercial paper, providing an essential source of liquidity for the commercial paper and municipal securities markets that are used to fund day-to-day operations. Structural changes like those that FSOC has proposed would shrink the industry, deprive of us of an essential source of working capital, and force us to move our investments to less regulated, less flexible products.

We believe that the alternatives included in your proposal could undermine the continued viability of these funds. The 2010 reforms to Rule 2a-7 significantly improved the liquidity and creditworthiness of MMMFs. Unlike these needed improvements, the actions recommended by FSOC would fundamentally change the structure and economics of MMMFs. We are particularly concerned by calls to scrap the settled method of accounting for MMMF (amortized cost accounting) and to

“float” MMMF’s net asset value (NAV). Likewise, the “minimum balance at risk” proposal would be unworkable and would make MMMFs economically unfeasible.

Amortized cost accounting permits these investments to be made without myriad tax, accounting and associated administrative concerns. By scrapping over 30 years of accounting precedent and floating the NAV for these funds, the FSOC would open Pandora’s box of tax and accounting burdens that would render these funds useless for short-term investments. In addition, many municipalities are prohibited by law from investing in funds that do not have a stable NAV. Requiring a minimum balance at risk to create a first-loss buffer would render MMMFs economically unfeasible—the return would not justify the loss of the use of funds trapped in the funds.

Again, it is important to note that any regulation that makes MMMFs a less attractive investment vehicle will result in a decline in fund assets. This, in turn, will dry up an important pool of liquidity for the commercial paper that we, or our members, rely on to fund daily operations.

MMMFs play an essential role in financing the day-to-day operations of American businesses and municipalities. Given their importance to our economy and job market, we would advise that a radical restructuring of these funds is unwarranted. Therefore, we urge the FSOC to not move forward with the Section 120 process and help preserve the irreplaceable utility of these funds.

Sincerely,

Alro Enterprises, LLC
Association for Financial Professionals (AFP)
Association of Commerce & Industry New Mexico
Basket Cat Productions
BD Construction, Inc. / Kearney
Bob Carter's Auto Body, Inc.
Brandywine Communications
Brooks & Brooks Real Estate Co.

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BSC Travel, Inc.

Burrage Music Company, Inc.

CAPTEL

Carpinteria Valley Chamber of Commerce

Central Paper and Supply

Cincinnati USA Regional Chamber

Corsicana Area Chamber of Commerce

Custom Hardware Engineering & Consulting, Inc.

Dallas Regional Chamber

Devon Energy

Dominion Resources

Elite Marketing Group

Engineered Systems, Inc.

F.C. Tucker Emge Realtors

Fairbanks Construction

Financial Executives International

FMC Corporation

Fort Worth Chamber of Commerce

Furniture Distributors, Inc.

G&R Sales & Service

Global Tooling Solutions, LLC

Greater Boston Chamber of Commerce

Greater Irving-Las Colinas Chamber of Commerce

Greater Nashua Chamber of Commerce

Greater Pittsburgh Chamber of Commerce

Greater Providence Chamber of Commerce

Greater Raleigh Chamber of Commerce

Greater Springfield Chamber of Commerce

Hastings Area Chamber of Commerce

Heartland Contractors, Inc.

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Heating, Air-Conditioning & Refrigeration Distributors International (HARDI)

Integrated Science Solutions, Inc.

Johnson City Chamber of Commerce

Joyco MultiMedia, LLC

Kentucky Chamber of Commerce

Kerrville Area Chamber of Commerce

Lost Creek Stone, LLC

Loveland Ready-Mix Concrete, Inc.

Magna Steel Sales Inc.

Metropolitan Mayors Caucus

Monticello Strategies

New Jersey Chamber of Commerce

North Carolina Chamber

Northern Rhode Island Chamber of Commerce

Outdoor Amusement Business Association, Inc.

Oxford Financial Services, LLC

Paws for a Dog

Perryton-Ochiltree Chamber of Commerce

Pharmacy Solutions

Quality Marble, Inc.

Redondo Beach Chamber

Retail Industry Leaders Association (RILA)

Ruston-Lincoln Chamber of Commerce

Safeway Inc.

Salt Lake Chamber

SawyerOne, Inc.

Silver Star Construction Co., Inc.

Smithville Communications, Inc.

Solutions for Long Term Care, Inc.

South Baldwin Chamber of Commerce

Southern Tank & Manufacturing Co., Inc.
Spin Techs, Inc.
Sprinkle & Associates, LLC
SWD, Inc.
Texas Association of Business
The Boeing Company
The Witte Co., Inc.
Thielen Plus Tax & Business Consulting
Timberville Drug Store, Inc.
Topeka Bench Ads, Inc.
Tucson Metro Chamber
Tulsa Regional Chamber
U.S. Chamber of Commerce

cc: The Honorable Elisse Walter, U.S. Securities and Exchange Commission
The Honorable Troy Paredes, U.S. Securities and Exchange Commission
The Honorable Luis Aguilar, U.S. Securities and Exchange Commission
The Honorable Dan Gallagher, U.S. Securities and Exchange Commission
Mr. Norm Champ, U.S. Securities and Exchange Commission
Dr. Craig Lewis, U.S. Securities and Exchange Commission