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SWAT

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April 11, 2011

Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street, NE.
Washington, DC 20549-1090

RE: Comments to Proposed Rules 15Ba1-1 through 15Ba1-7

Dear Ms. Murphy,

At their meeting of March 7, 2011, the Southwest Area Transportation Committee (SWAT) discussed and provided comments on the Securities and Exchange Commission (SEC) proposed Rules 15Ba1-1 through 15Ba1-7, and specifically, the proposed Rules definition of "municipal advisor."

It is the position of SWAT that appointees serving on the governing body of a municipal entity should be excluded from the proposed Rules definition of "municipal advisor," regardless of whether they were elected to such office, serve as ex officio members, or were appointed without election. Requiring these officials to register will increase the costs that state and local governments must bear, reduce the number of qualified individuals willing to volunteer for such duties, and may reduce the quality of services available to municipal entities. States already extensively regulate the activities of public officials and enforce accountability through reporting measures similar to those contemplated by the Rules. We urge you to reconsider your suggested treatment of appointed members of a municipal entity's governing body, and to allow them the same exemption provided to elected officials.

Thank you for your consideration and opportunity to comment on this matter. If you should have any questions or comments, please contact me at (925) 253-4220, or aworth@ci.orinda.ca.us.

Sincerely,

A handwritten signature in cursive script that reads "Amy Worth".

Amy Worth, Chair
Southwest Area Transportation Committee
Contra Costa County, CA

Cc: SWAT; SWAT TAC; John Cunningham, TRANSPLAN; Christina Atenza, WCCTAC; BarbaraNeustadter, TRANSPAC; DaniceRosenbohm, CCTA; Randell Iwasaki, CCTA