



UNIVERSITY OF HARTFORD

Walter Harrison
President

June 21, 2012



Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Re: Proposed Rule: Registration of Municipal Advisors
Release No. 34-63576 (December 20, 2010)
File No. S7-45-10

Dear Secretary Murphy:

I would like to add my voice in support of the concerns raised by the Association of Governing Boards of Universities and Colleges (AGB) about proposed SEC rule 15Ba1-1(d), defining the term "municipal advisors."

As president of the University of Hartford, a private nonprofit university located in Hartford, Connecticut, I have reviewed and agree entirely with the points raised by AGB president Richard D. Legon in his letters of February 15, 2011 and March 8, 2012. If members of governing boards, acting in their official capacity, were deemed municipal advisors required to register with the SEC, that could have a significant negative impact on the willingness of the most qualified persons to serve as board members.

As noted by the AGB in Mr. Legon's February 2011 letter, governing board members at institutions of higher education are decision makers, not advisors. This fact alone should be sufficient to establish the need to clarify in the proposed rules that governing board members, acting in their official capacity, are excluded from the definition of "municipal advisors." I therefore urge the SEC to adapt the changes proposed by the AGB in Mr. Legon's March 2012 letter, or comparable modifications achieving the same result.

Sincerely,

Walter Harrison

Walter Harrison
President