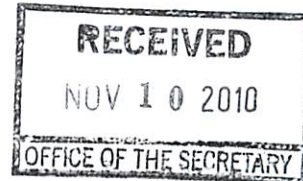


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November 9, 2010

Ms. Elizabeth M. Murphy
Secretary
United States Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090



Re: Comment letter on Release 34-63095; File Number SR-MSRB-2010-10

Dear Secretary Murphy:

Edward Jones appreciates the opportunity to comment on the Municipal Securities Rulemaking Board (MSRB) proposed rule change to increase transaction assessments for municipal securities transactions and to institute a new technology fee on reported sales transactions, as reflected in amendments to MSRB Rule A-13.

Edward Jones is a full-service retail broker-dealer serving more than seven million retail investors through approximately 12,000 financial advisors throughout the United States. Edward Jones' business model is based on providing personalized service and long-term investment opportunities to individual retail investors and small businesses.

Edward Jones applauds the efforts of the MSRB to improve transparency and disclosure in the municipal bond market. Edward Jones recognizes the MSRB's efforts and successes, in this regard, as evidenced through rulemaking efforts to encourage greater and more timely disclosure by security issuers, the availability of price and transaction information for investors through the EMMA website, and consolidation of material event disclosure information through the EMMA website. Edward Jones also understands that the continuation or expansion of such efforts require financial resources.

The MSRB states that "(t)he proposed new technology fee would help to establish a more balanced assessment of overall fees paid by dealers since it would be based on a dealer's participation in the market as measured by the total number of inter-dealer and customer sale transactions reported to the MSRB, rather than par value, and therefore would help to more evenly distribute the burden of dealer assessments." However, Edward Jones believes the

proposed \$1.00 technology fee per transaction places a disproportionate amount of the regulatory cost on broker-dealers who serve retail investors.

While all broker-dealers will share equally in an increase in the par value based transaction fee, the proposed technology fee will place a disproportionate burden on broker-dealers that serve individual retail investors. For example, an institutional broker dealer who sells \$1,000,000 par value to 10 institutional clients is charged the same par value based transaction fee as a broker-dealer who sells \$1,000,000 par value to 100 individual retail investors; however, the broker-dealer who serves individual retail investors would pay a technology fee that would be ten times greater than that paid by the institutional broker-dealer, under the proposed rule.

MSRB Market Statistics, which are available through EMMA, show that from January 1, 2010 through October 31, 2010 transactions between \$0 - \$100,000, which are generally understood as retail-sized orders, represent 82% of all reported transactions. Based upon these market statistics and the proposed application of the technology fee, it becomes clear that broker-dealers who serve individual retail investors will be required to pay an unfairly greater portion of the aggregate technology fee, which has been estimated to represent an additional \$10 million annually under the current rule proposal.

A flat technology fee does not equitably distribute the burden of dealer assessments as desired by the MSRB. We ask that the MSRB and the SEC consider one of the following alternatives:

- Increase the transaction fee to \$.02 per \$1000 par value, in order to achieve the MSRB's needed funding, but eliminate the proposed technology fee.
- Apply the technology fee based upon par value rather than a flat fee. This would be consistent with how most other MSRB fees are calculated and the application would allow the fee to be more equitably distributed among all market participants.

Edward Jones believes that the MSRB's stated goal to fairly distribute the financial burden of regulation to all broker-dealers who participate in the municipal bond market is best achieved through a variable fee structure that does not disproportionately burden broker-dealers who serve retail investors. Edward Jones appreciates the opportunity to comment on MSRB rule proposals and is happy to share additional information on this proposal. Please contact the undersigned if you desire additional information or dialogue, relating to our comments.

Sincerely,

Jesse Hill


Director of Regulatory Relations