

Comment on Notice 2016-13

from G. Letti, Breena Llc

on Tuesday, April 19, 2016

Comment:

We believe that the official minimum denomination should be the traditional 1000.

It is imperative to increase dealer and financial institution liquidity, so as to avoid the nail biting scenario of trying to sell a lot of 1,000,000 to multiple dealers in odd lots, with say 47 leftover. Of course, the 47 should be sold, but the amazingly small lot sizes of 5 or 10 or 47 etc. should be a rare occurrence.