

Comment on Notice 2021-08

from Jennifer Szaro,

on Monday, May 17, 2021

Comment:

I am thankful for this opportunity to comment on the proposed changes to Rule G-10. For perspective, we are a retail, small firm broker-dealer with an annual average of less than 100 municipal bond transactions and offer 529 plans. When we needed to provide this annual notification it was a significant expenditure and caused a complete change in our annual and disclosure deliveries. Annually we provide our privacy statement to all clients. However to incorporate the G-10 paragraph changed the entire mailing structure. We needed to revise our system and changed how we delivered disclosures. Our contact management system is not set up to identify muni only clients - most clients utilize multiple lines of business. For the amount of work and expense that it took to provide clients with a few sentences, there was a disproportional benefit to clients. We also post this message on our website along with other disclosures, which are all important. I wholehearted am in favor of revising this rule in particular to include "(f) Required Annual Notifications -regarding posting on the BD website. Investors are used to going to a company's website for details and accessing their materials. The greater the consistency with how we, as an industry, provide investors with reference materials and disclosures perhaps the more effective the delivery. My impression is that investors want to review materials at their pace, on their time, when it suits them. For broker-dealers who have a website, this is a very reasonable and sensible option.