



## Letters

# SEC Money Market Fund Proposal

## Summary

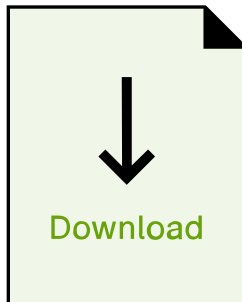
SIFMA and SIFMA AMG provided comments to the U.S. Securities and Exchange Commission (SEC) with respect to the Commission's request for comment on proposed amendments to Rule 2a-7 that govern money market funds under the Investment Company Act of 1940, and related proposed amendments to Form N-MFP, Form N-CR and Form N-1A.

We use cookies to provide our site visitors a valuable experience as well as relevant content and services. Please carefully review our Privacy Policy and Terms of Use; by using this website, you agree to the information set forth therein.

Accept

11)

- The SIFMA Podcast: A Primer on Proposed Reforms to Money Market Fund Rules (April 6)



PDF

## Submitted To

## SEC

## Submitted By

## SIFMA and SIFMA AMG

## Related Committee(s)

- Asset Management

## Date

11 April 2022

## Excerpt

April 11, 2022

Vanessa A. Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC  
20549-1090

---

We use cookies to provide our site visitors a valuable experience as well as relevant content and services. Please carefully review our [Privacy Policy](#) and [Terms of Use](#); by using this website, you agree to the information set forth therein.

Accept

---

The Asset Management Group of the Securities Industry and Financial Markets Association (“SIFMA AMG”),<sup>1</sup> together with the Securities Industry and Financial Markets Association (collectively, “SIFMA”),<sup>2</sup> respectfully submits this comment letter to the U.S. Securities and Exchange Commission (the “Commission”) with respect to the Commission’s request for comment on proposed amendments to Rule 2a-7 that govern money market funds under the Investment Company Act of 1940 (“1940 Act”), and related proposed amendments to Form N-MFP, Form N-CR and Form N-1A (the “Proposed Rule”).<sup>3</sup> We appreciate the opportunity to provide our views to the Commission.

We believe SIFMA offers a valuable and unique perspective on the Proposed Rule because, among other things, our members represent individuals and businesses that depend on money market funds as an essential cash management tool as well as issuers who depend on money market funds to create and maintain an active and robust market for the securities they issue. As fiduciaries to millions of investors and clients and as investment managers to money market funds used as investment

Continue Reading

1 SIFMA AMG brings the asset management community together to provide views on policy matters and to create industry best practices. SIFMA AMG’s members represent U.S. and multinational asset

management firms whose combined global assets under management exceed \$45 trillion. The clients of SIFMA AMG member firms include, among others, tens of millions of individual investors, registered investment companies, endowments, public and private pension funds, UCITS and private funds such as hedge funds and private equity funds.

2 SIFMA is the leading trade association for broker-dealers, investment banks and asset managers operating in the U.S. and global capital markets. On behalf of our industry's one million employees, we advocate on legislation, regulation and business policy affecting retail and institutional investors, equity and fixed income markets and related products and services. We serve as an industry coordinating body to promote fair and orderly markets, informed regulatory compliance, and efficient market operations and resiliency. We also provide a forum for industry policy and professional development.

3 Money Market Fund Reforms, Investment Company Act Release No. 34441 (Dec. 15, 2021), available at <https://www.sec.gov/rules/proposed/2021/ic-34441.pdf> [hereinafter Proposing Release].

---

We use cookies to provide our site visitors a valuable experience as well as relevant content and services. Please carefully review our [Privacy Policy](#) and [Terms of Use](#); by using this website, you agree to the information set forth therein.

Accept