



**NAMA's Response to the Federal Reserve's Municipal Liquidity Facility.
Submitted through the Fed Portal, April 16, 2020.**

Thank you for the opportunity to comment on the MLF. NAMA represents MAs from around the country, who in turn serve municipal debt issuers. We appreciate the intent of the MLF to provide liquidity to this market. However, we would like to make the following suggestions to further enhance the facility:

- Governments that are eligible to access the MLF should be expanded. While there is opportunity for local governments to access these funds through a state facility, that puts administrative and credit burdens on states, who may not be able or willing to do so. Further, it should be clarified whether the MLF will make purchases that are secured by a rated credit enhancement vehicle which is accepting the risk of the underlying credits.
- Allow more than one borrower per state to better facilitate the needs of local governments.
- Extend the MLF program deadline to at least the end of 2020.
- Provide clarity on the use of proceeds and have it be broadly interpreted so that governments may meet the unique needs of their own communities. Also include as allowable the costs for legal, advisory and other expenses related to these financings.
- Rating criteria and the types of credits that will be used to evaluate decision making should be clear as should the pricing methodologies.

The Fed should also use inputs from GFOA, NAST, and others as it structures the program and develops FAQs. If NAMA may provide any assistance, please contact us.

(submissions could not exceed a 1500 character limit)