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May 1, 2012

Internal Revenue Service  
Attn: CC:PA:LPD:PR  
(Notice 2012-25)  
Room 5203  
P. O. Box 7604  
Ben Franklin Station  
Washington, D.C. 20044

RE: 2012-2013 Guidance Priority List

Ladies and Gentlemen:

The National Association of Bond Lawyers (“NABL”) respectfully suggests the following items for inclusion in the 2012-2013 Guidance Priority List. Unless otherwise indicated, section references are to the Internal Revenue Code of 1986.

1. Guidance on the definition of “issue price” under Section 148.
2. Guidance regarding reissuance, including the application of the reissuance rules to multi-modal private placements.
3. Update to the management and service contract safe harbors in Revenue Procedure 97-13.
4. Reviewing, revising and finalizing proposed regulations concerning (a) public approval under Section 147(f), (b) allocation and accounting of proceeds and projects under Section 141, and (c) yield computation in connection with certain qualified hedges under Section 148 and related matters.
5. Guidance as to the qualification of bond insurance premiums and other costs described in the de minimis working capital exception in Treasury Regulations Section 1.148-6(d)(3)(ii) as capital expenditures for purposes of Treasury Regulations Section 1.150-1(b) and Build America Bonds under Section 54AA(g)(2).
6. Guidance as to the refunding of Recovery Zone Economic Development Bonds under Section 1400U-2, Recovery Zone Facility Bonds under Section 1400U-3, and Build America Bonds under Section 54AA.

These items are suggested as priority items. These items are not listed in any specific order of priority. Nor by suggesting them do we mean to withdraw any other items we suggested for any prior list.

The list of suggested items was compiled by a NABL task force. If you have any questions concerning them, please contact Michael Larsen (Chair of the NABL Tax Law Committee) at (843) 727-6311 or [MikeLarsen@parkerpoe.com](mailto:MikeLarsen@parkerpoe.com).

Sincerely,

Kristin H. R. Franceschi