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Division of Corporation Finance
Division of Investment Management
Division of Market Regulation
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

Ladies and Gentlemen

On June 1, 2007 we submitted a request for no action letter on behalf of the Missouri Bankers Association (the "MBA"), a not-for-profit association of commercial banks and savings and loan associations representing approximately 380 federal and state separately chartered commercial banks, savings and loan associations and out of state banks with one or more branches located in Missouri. The MBA is the principal advocate for the banking industry in Missouri and has developed a proposed program for an educational savings plan (the "Program") under enabling legislation in Missouri and Section 529 of the Internal Revenue Code of 1986, as amended ("Section 529"). After our submission of that June 1, 2007 letter, we had subsequent discussions with the staff of the Division of Corporation Finance, Division of Investment Management and Division of Market Regulation. We are submitting this revised request in response to those discussions.

On behalf of the MBA, we hereby request the Division of Corporation Finance to issue a no-action letter with respect to the offer and sale by participating banks in the State of Missouri of the depository instruments described herein without registration under the Securities Act of 1933, as amended (the "1933 Act") and the Securities Exchange Act of 1934, as amended (the "1934 Act"). In addition, we seek the concurrence of the Division of Market Regulation that it will not recommend any enforcement action if the participating banks and their employees administer the plan described herein without registering as broker-dealers pursuant to Section 15(a) of the 1934 Act. Finally, we request that the Division of Investment Management concur that it will not recommend enforcement action under the Investment Company Act of 1940 (the "1940 Act") if the program proceeds as described in this letter. We understand that any proposed material deviation from the description contained

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