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Wednesday, October 13, 2010

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: File Number S7-15-10

Dear Ms. Murphy:

Dear Ms. Murphy,

I am writing to you to express my concern over the recent proposal to change 12b-1 fee structure. I believe that 12b-1 fees allow me to service my clients in the most cost efficient manner for the client and allow me to service retirement and college saving needs of investors with medium and small size portfolios. I feel that changing 12b-1 fees as we know them now would force me to convert many of those accounts to fee-based model which would make it unprofitable to service clients with portfolios under certain size. This would likely lead to investors with smaller size portfolios not having access to investment advice and impairing their ability to save for retirement and other goals.

12b-1 fees allow clients greater flexibility to move from one fund family to another after 2-3 years if market conditions have changed and not have to wait until an investor breaks even on the sales charge of Class A share while the client may be losing money in an existing fund due to market conditions or missing better opportunities elsewhere.

With that said I firmly believe that the existence of 12b-1 fees allows an investor with smaller to medium size portfolio a greater flexibility to navigate everchanging markets and I hope that the SEC takes my thoughts into consideration when making the final decision on 12b-1 fees.

Sincerely,

Mr. Charles Haddad



Charles Haddad