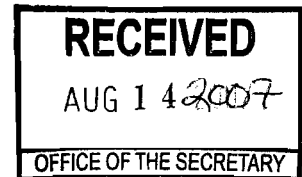


4538-462

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



Wednesday, August 08, 2007

RE: SEC Review of Rule 12b-1

Dear Ms. Morris:

I urge the SEC to allow Rule 12b-1 to continue. It supports my efforts to provide needed financial services to my clients pursuit of their financial goals.

Clients need the continuing service, guidance and support to achieve their investment goals. 12b-1 fees support the continuing service which these clients require for successful investing. The benefits of 12b-1 fees include:

- Investor Choice - The multiple share classes made possible by Rule 12b-1 give investors choices by providing them with options in how they pay their financial advisor.
- Investor Education /Financial Literacy - Mutual funds send their investors monthly statements, confirmations, prospectuses, annual reports, and other materials. We help investors to make sense of these essential materials. 12b-1 fees are the compensation received for these efforts.

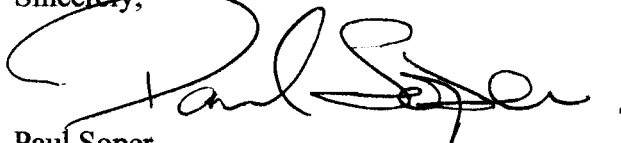
- Managing Client Expectations - We all know the common mistakes investors make; buying high and selling low, chasing past performance and harboring unrealistic expectations. 12b-1 fees provide compensation to manage client's expectations and protect them from falling into this common investor traps.

- Insuring Small Accounts Receive Service - Investment advisory services are simply out of the reach of many small account holders. Financial advisors must have another means of being fairly compensated for servicing these accounts. 12b-1 fees provide the mechanism to insure small investors receive the support and service they need to achieve their financial goals.

- Subsidizing Additional Services - Independent financial advisors offer their mutual fund clients a variety of additional services including: consolidated account statements, periodic portfolio review meetings, quarterly newsletters, cost basis research, preparation of tax returns, and consulting on other financial decisions. These important services are made possible by the subsidy 12b-1 fees provide.

In conclusion, while it is reasonable to review the investor benefits of 12b-1 fees, it is obvious that the repeal of 12b-1 has the potential to cause great harm to thousands of individual investors who need the support and service of a trained financial advisor.

Sincerely,



Paul Soper  
INVEST Financial  
9600 N. Kendall Drive, Miami FL 33176