



Kevin D. Frost, CLU®, ChFC®
Financial Representative

November 2, 2010

Elizabeth M. Murphy
Secretary of the Securities and Exchange Commission
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RE: File Number S7-15-10

With regard to the above referenced file, I have been a licensed insurance and financial advisor for over 15 years. I support the new SEC rule 12B-2 which would continue to provide a 25 basis point fee which would be used to provide compensation for financial advisors for the ongoing service they provide their investment clients. I have no problem with renaming that fee something that is more descriptive of its purpose. I agree with your efforts to improve the transparency in the disclosure documents provided investment clients.

I strongly object, however, to your permitting mutual funds to issue a new share class with negotiable ongoing service fees. While I understand this may seem to provide greater options for investment clients, in reality, it will further discount the compensation provided investment providers particularly in small and medium sized market places. Discounting this compensation makes it less profitable for us to service those clients and thereby makes it less likely they will receive the ongoing service they require. By discounting or allowing those fees to be discounted, you reduce the incentive for investment advisors to provide that ongoing service. Many advisors will choose to discount their products in an effort to simply gain market share and new investment dollars without considering the need for ongoing service thus eliminating advisors and service from that market place.

I would urge you to more strongly consider maintaining the current 25 basis points fee. Our small and middle income clients will be better served.

Thank you for allowing my input. I can be reached at 618-988-8080 if you have any further questions.

Cordially,

Kevin D. Frost, CLU, ChFC



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