

Securities and Exchange commission
100 F Street, N.E.
Washington, DC 20549-1090
United States

Chris Barnard

21 October 2010

-File No. S7-15-10
-Mutual Fund Distribution Fees; Confirmations

Dear Sir.

Thank you for giving us the opportunity to comment on your proposal on Mutual Fund Distribution Fees, a proposal to replace 12b-1 fees.

I support the proposals in principle, particularly the aims of protecting investors by limiting fund sale charges, improving the transparency of fees to investors and encouraging retail price competition.

An alternative and more flexible proposal could be to link mutual fund distribution fees to the overall fund expense ratio, rather than limiting distribution fees. For example, cap distribution fees at one quarter of the total fund expense ratio, including distribution fees. In this case, a fund charging total expenses of 2% could only charge a distribution fee of 50 basis points, leaving 150 basis points for all other fund expenses.

Yours faithfully

Chris Barnard