

August 11, 2010

SEC

Attn: "C" Share Revisions Committee
100 F Street, NE
Washington, DC 20549

To Whom It May Concern:

I write in strong opposition to potential changes proposed to the "C" share class structure. As an independent and Certified Financial Planner practitioner I'm able to price my business at a lower cost to my clients using "C" shares versus the fee based model my custodian offers.

The current "C" share structure allows me to perform my fiduciary duties without the conflict of interest created by a transaction based compensation model. Both "A" and "B" shares reward the active trading of mutual funds as opposed to a long term investor focused process.

I will not be able to run my business on a .25% trail and will be forced to move my clients to a fee based platform which is ultimately more expensive for the client. Further, there is currently no mechanism to allow the conversion of "C" shares to a "No Load" version for the purpose of utilizing a fee based platform. There would need to be a process for conversion in order to avoid the demise of many businesses like mine.

During the worst bear market since the Great Depression, I was able to keep my clients invested long-term. Many of my clients would have sold without my advice and guidance. This advice saved my clients hundreds of thousands of dollars since the market has started to recover.

If the SEC wants to look into high cost investment vehicles, please consider the structure of variable annuities. The "C" share mutual funds that I invest in are an inexpensive and prudent alternative and I deserve to make fair compensation for my advice and guidance which allows me to pay my employees and run a service driven business.

Sincerely,

Thomas E. Quirk, CFP®, CRPC
President
Retirement & Investment Group, LLC