



HEGGE FINANCIAL GROUP

November 4, 2010

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

RE: File Number S7-15-10

I am writing in support of SEC Rule 12b-2 which would continue the 25 basis points fee, which will allow me to continue to provide ongoing service and advice to people who do not necessarily have large account balances. I have been a licensed insurance professional for over 35 years and a registered representative for over 25 years. I understand the value of my advice to clients who need my help concerning their retirement accounts and mutual fund investments.

While I understand also that it is important to have transparency and provide the lowest possible share costs to clients, we must avoid creating a share class that does not allow for compensation to the advisor so he/she may provide future service. Over the years, the SEC, Broker Dealers and Registered Representatives have worked hard to protect the investor from unnecessary costs and charges, but we cannot expect investors to make all of their own decisions in the future without the advisors help.

I feel certain that while the SEC is trying to protect these middle-market investors, if we cannot afford to offer service to those same investors, they will eventually fall victim to agents and advisors selling inferior products that are not appropriate for their individual needs.

We also do not want one or two Broker Dealers to have the opportunity to promote the illusion that people can have lower and unreasonably low sales charges and fees and offer the impression to the public that service can also be provided. While that may assist with immediate market share for the Broker Dealer, long term everyone suffers.

W. EDWARD HEGGE, III CLU | PRESIDENT | ADVISORY REPRESENTATIVE *

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I would urge you to consider my comments on this matter as I have been in this industry long enough to know the value of individual service to investors with all size account balances.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Edward Hege III". The signature is fluid and cursive, with a prominent initial "W" and a long, sweeping underline.

W. Edward Hege III, CLU
Advisory Representative