

EDELMAN

FINANCIAL SERVICES

LLC

February 4, 2008

Ms. Nancy M. Morris
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Room 6200
Washington, DC 20549-1090

Dear Ms. Morris:

RE: File Number S7-28-07

These are my comments regarding the SEC's proposal of rule changes that are intended to improve mutual fund disclosure.

As an award-winning financial advisor, I operate one of the largest financial planning and investment firms in the nation, managing approximately \$4 billion for more than 8,000 clients nationwide. I also host a national radio program that reaches one million people weekly on the ABC Radio Networks, and I speak frequently to tens of thousands of people at seminars and conferences nationwide. I am also a member of the American Savings Education Council and the Jump\$tart Coalition for Personal Financial Literacy, and I am the only financial advisor in the nation who was appointed to serve as a Delegate to all three National Summits on Retirement Savings.

My experience working with individual investors, and in counseling ordinary consumers and workers from coast to coast, has convinced me of the need for improved disclosure of mutual fund fees. Therefore, I applaud the Commission's efforts in this area.

The Commission's proposals are valuable and should be implemented. However, the proposals do not go far enough. It is not sufficient to publish summary information in prospectuses or other publications – because the average investor never reads these documents. It is also insufficient to report fees and expenses as a percentage of assets – because a very large portion of investors are unable to translate percentages into dollars and cents for their own accounts.

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Ms. Nancy M. Morris
February 4, 2008
Page Two

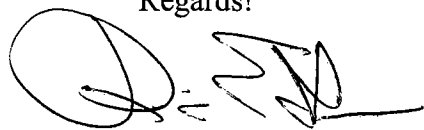
Therefore, I urge the Commission to require mutual funds to disclose **all** costs on each monthly, quarterly and annual statement, in dollars and cents. Funds already provide share balances and share prices, demonstrating that they are perfectly able to provide account-specific financial information. There is no reason to withhold this information from investors, for it is they who are paying these charges.

Failure to disclose all fees and expenses directly on statements is a tremendous disservice to consumers. In October 2007, the GAO reported to Congress that a 1% annual fee over long periods reduces future account balances by 17%.

The current proposal will not materially improve this situation. The only action that will achieve meaningful results for investors is to disclose all fees and expenses – both those currently found in the prospectus as well as those published in the Statement of Additional Information – that are paid by each account, in dollars and cents, directly on the periodic statements. I urge the Commission to adopt such a policy.

Thank you for this opportunity to comment.

Regards!

A handwritten signature in black ink, appearing to read 'Ric Edelman', with a large circular flourish on the left side.

Ric Edelman
Chairman & CEO

RE/scb