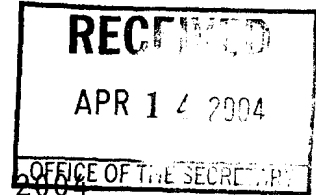


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April 5, 2004

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Mr. Jonathan G. Katz  
Secretary  
Securities & Exchange Commission  
450 Fifth Street, NW  
Washington, DC 20549-0601

Dear Mr. Katz:

File No. S7-13-04

I direct my comments only to that portion of the concept release relating to reducing the use of physical securities.

My comments are based on my experience in the early 70's as a member of BASIC - the task force responsible for planning and developing DTC.

With a new generation of investors, it is as the Commission states, "an appropriate time to consider further steps to remove securities certificates from the U.S. trading markets and our clearance and settlement system". The Commission and the financial community over the past quarter century has made steady progress towards that goal as outlined in its concept release. The major obstacle, as the Commission well knows, is to convince a minority of retail investors that a certificate-less system can protect his or her interests better than the present system.

An essential first step is for the Commission and the financial community to develop a communications plan to help convince retail investors that a certificate-less system will improve the functioning of our markets and reduce risks in the clearance and settlement of securities. The Commission or the SIA might want to consider retaining a consulting firm to help develop that plan. The Commission will need to demonstrate to Congress and investors that it is timely to mandate a certificate-less system.

Very truly yours,

A handwritten signature in cursive script that reads "Ralph S. Saul".  
Ralph S. Saul