

March 31, 2005

Jonathan G. Katz-Secretary  
Securities & Exchange Commission  
450 Fifth St., N.W.  
Washington D.C. 20549-0609

Re: File No. S7-06-04

I am a registered representative and have been in the financial services business for 35 years. I am writing you because the new disclosure requirements in the SEC's proposal for the sale of mutual funds & variable products are not necessary, create an additional burden on registered representatives and add to the general confusion consumers already have. Currently, if a client wants to purchase a mutual fund I must give him a prospectus which is full of information on fees and costs as well as important information on the investment. In addition to the prospectus I must fill out or give the following forms:

1. Application for the mutual fund.
2. New account form for my broker dealer including suitability information and their driver license number.
3. Class A, B or C share disclosure form (which duplicates info in prospectus).
4. Replacement disclosure form if money is coming from another investment.
5. Privacy notice.
6. Class share and breakpoint disclosure statement. (Another statement already explaining what is in the prospectus.)

With all of the above paperwork, registered representatives find it hard to cover their costs for the small investors who probably most need out help.

It is my understanding the SEC has already taken steps to simplify the prospectus which is an important document the consumer should be reading since it discusses risks, performance, fund objectives as well as fees & expenses.

Why do we want to condense this important document down to one page? Wouldn't it be better to have consumers sign a simple statement that they have been given a prospectus and understand important information on fees & expenses is inside and should be discussed with their registered representative?

Consumers should be focusing on not only fees & expenses, but balancing that out with fund performance, fund management expertise & whether fund objectives match their risk propensity.

I feel this proposal should be withdrawn from consideration and let's make an effort to enforce and simplify all the disclosure documents we now have.

Thank you for your time.

Sincerely,

Daniel R. Balch, CLU, ChFC  
Registered Representative