

November 11, 2004

Secretary Jonathan Katz

Dear Secretary Katz,

As an investor advocate, I commend the Commission for its bold step to require brokers to provide pre-sale disclosure of costs and conflicts of interest when they sell mutual funds. However, I am concerned that certain aspects of the proposal, including the proposed timing, content, and format of the disclosures, need improvement.

You are charged with writing laws which protect consumers of security products.

With a few strengthening provisions, I believe this rule proposal could help investors to make more cost conscious mutual fund purchase decisions, potentially saving us tens of thousands of dollars over the life of our investments.

Specifically, the rule should provide for written disclosures at point of recommendation, rather than point of sale.

The disclosure rule should also include mutual fund operation costs, including sales-related costs.

All disclosures need to be provided in LARGE PRINT in a clear and simple manner so investors can understand them. Perhaps they should be placed together within a box, in a second conspicuous place, so they can not be missed.

Thanks for considering my concerns.

Sincerely,

P Brown
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