

Michael Marion

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From: Michael Marion
Sent: Thursday, March 31, 2005 12:11 PM
To: 'Rule-comments@sec.gov'
Subject: File No. S7-06-04



Jonathan G. Katz, Secretary
Securities and Exchange Commission
450 Fifth Street, NW
Washington, DC 20549-0609
Re: File No. S7-06-04

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I am a licensed insurance professional and variable products registered representative.

I am writing to you because the new disclosure requirements contained in the SEC's proposal regarding the sale of mutual funds and variable products are unnecessary and will provide no meaningful additional protection to consumers.

A disclosure that only discusses an investment's fees and expenses will lead clients to focus on the investment's costs rather than its overall value to the consumer, and therefore is not in the consumer's best interest.

American business is built on a free enterprise system and competition, these factors force investment professionals to bring value added service as well as cost efficient and competitive financial products to the client. Mutual fund and variable annuity prospectuses already discuss the fees, risks and expenses associated with the purchase of these products. Requiring a new, separate disclosure document at the point of sale and at confirmation would duplicate information already found in the prospectus, create confusion.

Instead, the SEC should focus its efforts on getting consumers to carefully read the prospectus they receive.

For these reasons, I urge the NASD withdraw the proposed rule.

Thank you for your consideration of my views on this matter.

Respectfully,

Michael J. Marion, CLU, ChFC, CSPG

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