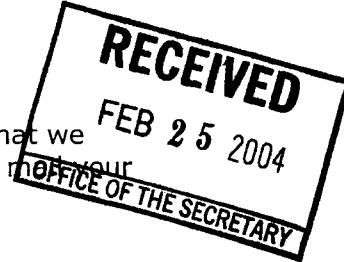




Board of Directors, DC Regional Chapter of NAIC
Rule Comments
Proposed Rule on Mutual Fund Disclosure Forms
(SEC File No. S7-06-04)

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Name: Charles H. Harris



Please be aware that all comments we receive will become part of the public record of what we considered in this matter. Please return the comment form to the SEC representative or mail your comments to the following address:

Jonathan G. Katz, Secretary
U.S. Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D.C. 20549-0609

Comments: The point of sale and confirmation
disclosures should also describe any redemption fee,
any 12 b 1 fee and the fund expense ratio for the
preceding full year. The expense ratio may vary depending
on the class of shares purchased, so disclosure of the
expense ratio and front-end sales load should be made
simultaneously,

This proposed rule does nothing to show
that not all no-load funds are ^{created} equal. The
12 b 1 fee should be highlighted in the point of
sale and confirmation disclosures to show the true
cost of a no load fund.

This rule should be broadened to include
investment companies that offer no load funds, closed end
funds and exchange traded funds.