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February 12, 2004

Mr. William H. Donaldson, Chairman
Securities and Exchange Commission
450 Fifth Street NW
Washington, DC 20549

Dear Chairman Donaldson:

As Sr. Vice President of Human Resources, I am opposed to imposition of a "hard close" for settlement of mutual fund orders for participants in any defined contribution pension plan. This imposition of a "hard close" would virtually eliminate same day settlement of participant directed trades received prior to market close. Our recordkeeper has systems and controls in place to enforce the market close for same-day transactions, and transmits these trades in the hours following the market close. We believe it is unfair to penalize the participants in our defined contribution plan for abuses that were committed by others. The imposition of a "hard close" rule would force most participants to have a lag of a day or more to settle fund trades which are now handled overnight.

I also encourage the SEC to adopt a uniform definition of "market timing." Our plan currently utilizes investment options from a number of different mutual fund companies. Without a common definition of "market timing", participants may be confused about the different rules applicable to different funds. In addition, our participants may face increased administrative fees or restrictions if our recordkeeper has to enforce multiple definitions or "market timing" among different funds.

Our plan is popular with many small investors who use the plan as their primary supplemental retirement savings vehicle. Technological advances in recent years have enabled us to offer small investors many of the same opportunities available to larger investors, and at a reasonable cost. The imposition of a "hard close" on defined contribution pension plans would be detrimental to millions of small investors who enjoy the convenience of currently trading practices.

Sincerely,

Jacques D. Gattis, Sr. Vice President
Human Resources

