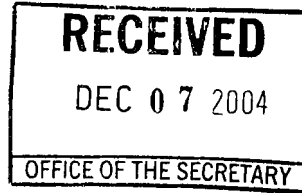


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Edward Jones



December 3, 2004

Mr. Adam B. Glazer, Attorney  
Office of Regulatory Policy  
Division of Investment Management  
Securities and Exchange Commission  
450 Fifth Street, N.W.  
Washington, DC 20549-0609

S7-27-03

Dear Mr. Glazer:

At the suggestion of Liz Ostermann (SEC Attorney in the Investment Management Division), I am writing to provide a real life, real time example of why the SEC should consider including a systemic failure provision in your upcoming hard 4:00 p.m. close mutual fund rule.

As you may be aware from various press coverage, Edward Jones has experienced the loss of our satellite which is used to communicate to and from each of our almost 9,000 branch offices. The loss of this satellite has resulted in, among many other things, the need for brokers to phone in orders via telephone and/or fax which they normally enter on terminals in their offices.

As Edward Jones normally takes approximately 35,000 mutual fund orders each day, clearly this has the potential for creating a major bottleneck. If our mutual fund order volume would have remained at 35,000 orders a day, we would have been unable, in all likelihood, to enter all orders received prior to 4:00 p.m. by our brokers into our trade capture system by the 4:00 p.m. hard close. To have several hundred or even thousands of customer orders not given today's price or given today's price and executed tomorrow through our error account at the firm's risk, would not have been good service or good financial management.

Unfortunately, our order volume has only been about half our normal rate and we have been able to keep up with phones and faxes on a real time basis and so far would not have needed to rely on any regulatory relief from a hard 4:00 p.m. requirement. However, should volume have been more like normal, we, in all likelihood, would have had significant challenges getting trades in by 4:00 p.m. and would have requested regulatory relief from the hard 4:00 p.m. close.

Obviously, this real life example provides some insight into why it would be prudent for the SEC to consider a regulatory relief provision for systemic problems in its forthcoming hard 4:00 p.m. close proposal.

Should you have any questions or need additional information, please feel free to contact me at 314-515-6377.

Respectfully,



Norman Eaker  
Principal, Operations

NE/dm