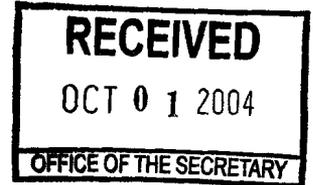


3

September 30, 2004

Jonathan G. Katz  
Secretary  
Securities and Exchange Commission  
450 Fifth Street NW  
Washington, D.C. 20549-0609



**Re: File No. SR-AMEX-2004-75**

Dear Mr. Katz:

UBS Securities LLC ("UBS") respectfully submits this comment letter regarding SR-AMEX-2004-75, in which the American Stock Exchange ("Amex") seeks approval from the Securities and Exchange Commission ("Commission") to modify Rule 154. The proposed modifications to Rule 154 would prevent specialist organizations on the Amex from charging commissions for orders that are not executed, and from certain orders that do not require any type of special handling.

UBS strongly supports this proposed rule change and believes it to be axiomatic that a specialist should not be permitted to charge a commission for **NOT** executing an order. Furthermore, we believe it is unfortunate that the Amex has been compelled to file the proposed change when current Amex policies, as identified in this filing at issue,<sup>1</sup> clearly allow member organizations to charge commissions only for orders that require special handling or for which the specialist provides a specifically identified service. Based upon these expressed policies, as well as a rational and long-standing view of the specialists' function, it is both illogical and inappropriate for fees to be assessed by specialist organizations for executing routine orders or for simply canceling an order.

We appreciate the opportunity to address the Commission concerning this matter and ask that this proposed rule change be approved as quickly as possible to avoid the continued assessment of these unreasonable and improper fees. If you have any questions concerning this letter, please contact Scott W. Anderson at (203) 719-6974.

Sincerely,



Ryan Primmer  
Managing Director  
UBS Securities LLC

cc: Robert L. D. Colby, Deputy Director, Division of Market Regulation  
Peter Quick, President, American Stock Exchange LLC

---

<sup>1</sup> Section II.A.1