



Gerald J. O'Bee, CLU, ChFC, CLTC
Insurance and Financial Services
Certified Family Business Specialist

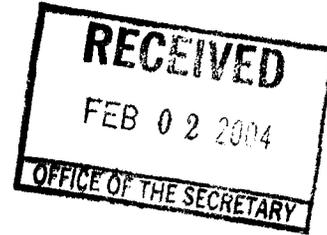
3152 Peregrine Drive NE Suite 110
Grand Rapids MI 49525
Tel (616) 447-7665
Fax (616) 447-4381
Toll Free (888) 589-5846
e-mail: jobee@finsvcs.com

SR-NASD-2003-104

38

January 26, 2004

Secretary
Securities & Exchange Commission
450 Fifth St. NW
Washington, D.C. 20549-0609



Dear Secretary,

As a Registered Rep selling variable products and mutual funds, I write to you to response to a proposed review of the definition of "branch office" in Rule 30(0(g)(2). This review if approved would greatly affect my business.

The extra financial expenses and administrative costs precipitated by changing the status of my non-branch location to a branch office will make the cost of doing business too high. My clients will lose quick and convenient access to the products I sell and service.

Since my broker-dealer is affiliated with a life insurance company, I see how we will be negatively impacted while full-service broker-dealers will have no disruption in their operations.

This is discriminating against the little guy - very un-American. My broker-dealer would have to restructure at great expense, while filling the coffers of someone else with the extra fees. How are clients helped by all this?

I urge the SEC to reject the NASD proposal because I see no advantage for my clients and much advantage to the NASD.

Thank you for reading this letter with an open mind.

Sincerely yours,

Gerald J. O'Bee, CLU, ChFC, CLTC, CSA