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James M. Juengling CLU, ChFC

HE SECRI LARY

OFFICEC

November 1, 2010

Ms. Elizabeth M. Murphy Secretary Securities and Exchange Commission 100 F Street, NW Washington, DC 20549-1090

Re: File Number S7-15-10

Secretary Murphy:

I am very concerned about a portion of the proposed rules to reform SEC Rule 12b-1 that would allow mutual funds to establish new share classes to be issued at NAV with B/D's allowed to set a sales charge. Rather than create lower consumer costs my fear is, in some cases, it could actually increase costs and add another layer of confusion to an already confusing process for many consumers. I have no problem with renaming the 12b-1 fees to more accurately describe its function as ongoing payments to assist a registered rep to service existing business.

I would appreciate your consideration of my comments.

Sincerely,

James M. Juengling

JMJ/rae

Registered representative offering securities and advisory services through Independent Financial Group LLC, a registered broker-dealer and investment advisor. Member FINRA & SIPC. (OSJ: 1755 Park Street, Suite 200, Naperville, IL 60563.) Independent Financial Group LLC and Juengling & Associates are independently owned and operated.