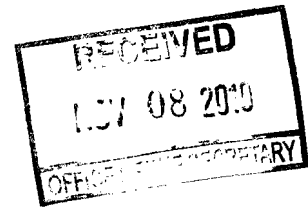


November 1, 2010

RE: File # S7-15-10

Dear SEC,



For the last 25 years I have been an insurance professional and registered representative. I support the new 12b-2 rule that ensures my clients of ongoing service in place of 12b-1 fees.

However I strongly object to fund families creating a new class of shares that would allow broker-dealers to set their own sales charge and commission amount. It sounds good however as BD's lower fees to beat the competition, it will no longer pay me to give the amount of service my clients deserve especially with the clients with smaller accounts who most likely need our help the most. Consequently the upper income investors may go to assets under management arrangements with me and continue. However, the smaller investor may be forced to do it on their own or go to discount brokers that offer limited help.

Bottom line is the people the SEC is trying to help the most will get hurt the most by cutting out advisors who help them with their financial decisions.

As much as I would like to help everyone with everything, in order to keep my practice going I must be paid a fair amount for the service I provide.

Thank You, Robert Farabaugh

A handwritten signature in cursive script that reads "Robert Farabaugh".

Etters, Pa. 17319