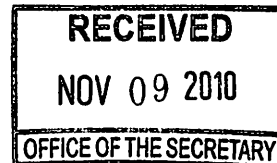


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November 3, 2010

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



RE: File No. 57-15-10

Dear Secretary Murphy,

I appreciate the effort to reform Sec.Rule 12b-1. It is important to improve the transparency of distribution and marketing fees that are disclosed to consumers. "Marketing and Service Fees" is a clear description.

However, I strongly object to the SEC permitting mutual funds to issue a new class of shares at net asset values that would allow brokers-dealers to set their own sales charges and commission amounts.

I am a licensed insurance professional and registered representative for over 37 years. My markets are to lower and middle investors. These people cannot afford a "Fee Based" broker, but need the advice of a professional to coordinate their assets and provided creative planning with emphasis on continuing service.

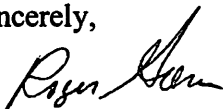
As broker dealers have their sales charges and fees to gain market shares, it will not be feasible for me to continue to provide the level of individual professional advice and service. The end result will be the non "Upper Income" investors who cannot meet the assets under management arrangements will be forced to "Self Direct" their accounts because I will no longer be able to afford to spend the time to guide and advise them.

Once again, the middle and lower market investors will be hurt, since they will be deprived the guidance and service they need and deserve.

I would appreciate you addressing my concerns.

Best wishes always.

Sincerely,



Roger Goren, CLU
RG: cc