

Dear Madame Secretary,

I have been a licensed insurance professional and registered representative for over 12 years. I work with small employers in Colorado to sell and service all forms of employee benefits. The average group size is 15 employees and the employers have limitations on the ability to offer retirement plans such as 401(k) plans due to the cost of administration. I sell and service SIMPLE IRAs to many small employers so the employees can develop a retirement account beyond the limits of a traditional IRA.

I do support the new SEC rule 12b-2, that would continue the 25 basis points fee that is used to ensure that investors receive ongoing service and advice, and I support the goal of improved transparency in disclosure documents.

However, I strongly object to the SEC permitting mutual funds to issue a new class of shares at net asset value that would allow broker-dealers to set their own sales charges and commissions as I believe the unintended consequence will be the loss of service to smaller investors.

Such action will hurt the investors the SEC is seeking to protect as we who work in the middle and lower markets will not be able to give the guidance and service such investors now seek and receive.

Thank you for your consideration of my opinion.

Russell Porter, CLU®, CLTC