THE CITY OF SUMMIT
NEW JERSEY

216

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March 23, 2004

Jonathan G. Katz
Secretary
Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D.C. 20549-0609

Re: Proposed Amendments to Rules Governing Pricing of Mutual Fund Shares
File No. S7-27-03

Dear Mr. Katz::

As a sponsor of retirement plans for public sector employees, I believe that regulations proposed by the federal Securities and Exchange Commission would place our employee/investors at a severe disadvantage.

We believe that the regulations proposed by the SEC will not correct the serious problems the commission is attempting to address. Instead, the solutions outlined would reduce the fund options and increase the costs for investors in these plans.

We believe that the proposed change would have the following adverse impacts on the investors in our plan:

- Eliminate same-day pricing – Because of the time required to process the transaction, the administrator would need to close off trading several hours before the 4 p.m. ET cut-off.

- Increase plan administration costs – the new regulations would require substantial changes to the operating systems, which would on an industry-wide basis be passed on to the retirement investor.

- Reduce the fund offerings – Since there would be a definite time advantage to only handling the firm's proprietary funds, administrators would most likely be inadvertently encouraged to limiting offerings to their own funds, reducing participant choice.

As an alternative, we endorse the proposal that would require our administrator to mark the transactions at the time received in a manner that would prevent manipulation of the trades. In addition, we advocate very tight third-party oversight of the administrator to prevent abuses.

Thank you for your attention to this matter.

Sincerely,

Ronald J. Angelo
City Treasurer/Chief Financial Officer