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February 25, 2008

Submitted electronically

Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

SUBJECT: File Number S7-28-07

Dear Ms. Morris:

The members of the Boards of the RiverSource Funds appreciate the effort that is being made by the Commission to encourage more investors to read a fund's prospectus and understand the way in which their investments will be managed. Clearly, a three or four page pamphlet in a familiar layout and written in plain English would be something individuals would be more likely to read.

We like the idea that each fund will provide a pamphlet setting forth the information in the same order since this will make it easier to compare funds. We also like the idea that the pamphlet will tell investors where to find more detailed information. However, we understand that there may be issues about the links required to locate that information. We encourage the Commission to evaluate the costs associated with requiring multiple links. We also encourage the Commission to re-visit the proposal for quarterly updates. Such a requirement could significantly add to the costs and complexities of compliance without much benefit to investors.

We strongly support permitting mutual funds to provide their prospectus on line. Investment advisers, industry commentators, and individuals who invest directly will know the location of these documents and will continue to study them. It is important for investors who are not familiar with or have limited experience in using funds in their personal saving programs to have a brief explanation of the salient aspects of their investment. For those who want addition information, the summary prospectus will tell them where that information is located.

We encourage the Commission to evaluate the proposed contents of a summary prospectus from the viewpoint of an individual with a limited knowledge of a mutual fund. As industry participants, it is easy for us to highlight aspects of a fund's

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operations that might not be the most significant to a person considering our investment in a mutual fund. We are confident that the Commission will determine the appropriate content and layout. We would like to emphasize the need to move forward with this proposal as quickly as possible

In conclusion, we want to commend the Commission in its effort to utilize the technology that is available to the vast majority of investors. This effort can result in more meaningful information being provided in a cost effective manner and in a more timely fashion. Thank you for the opportunity to comment on the proposed summary prospectus.

Yours sincerely,

/s/

Stephen R. Lewis, Jr.
Independent Chairman
RiverSource Funds