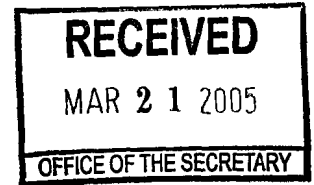




ML Stern & Co., LLC

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March 10, 2005

Jonathon G. Katz, Secretary
Securities and Exchange Commission
450 Fifth St., NW
Washington, D.C. 20549-0609

RE: Release Nos. 33-8544; 34-51274; File No. 57-06-04.

Point of Sale Disclosure Requirements and Confirmation Requirements for Transactions
in Mutual Funds, College Savings Plans and Certain Other Securities

Dear Mr. Katz:

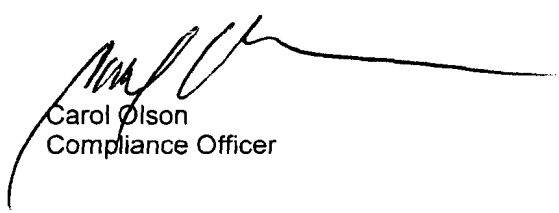
Our broker/dealer is a self clearing full service regional broker dealer.

We would like to have time to analyze the new proposals and forms in order to provide a meaningful response.

Please consider extending the comment period ninety days or more to give our firm and other broker – dealers our size more time to comment on the extensive new proposed mutual fund confirmation disclosure and point of sale disclosures

Thank you for your time and consideration of this correspondence.

Best regards,


Carol Olson
Compliance Officer

cc: James D. Portman