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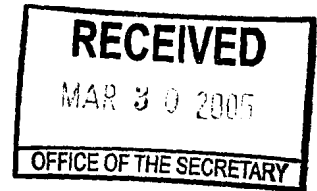
SECURITIES AND EXCHANGE COMMISSION
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ProEquities 

DIVISION OF MARKET REGULATION

March 17, 2005



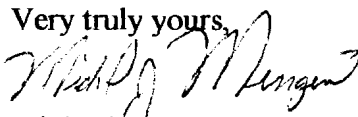
Annette L. Nazareth
Director
Division of Market Regulation
Securities and Exchange Commission
450 5th Street, NW
Washington, D.C. 20549

Re: Release No. 33-8544
File No. S7-06-04

Dear Ms. Nazareth:

The purpose of this letter is to request a one-month extension of the time for interested parties to file a comment letter with respect to the above-captioned release. The release, which poses more than 100 questions for public comment, provides for only a 30 day comment period. The release proposes new disclosure requirements and other obligations on broker/dealers, and would substantially impact the manner in which securities business is conducted and the costs that the public will ultimately have to pay in order to invest in securities. Furthermore, the Easter holiday and many school spring break vacations will occur during the comment period which will, as a practical matter, adversely impact the ability of broker/dealers, fund companies, insurers, investors, and other interested parties to provide comprehensive feedback on the release.

I look forward to your response, which I hope will be favorable in light of the serious public policy issues under consideration.

Very truly yours,

Michael J. Mungenast
President, ProEquities, Inc.