



FINANCIAL SERVICES



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March 31, 2005

1214

Jonathan G. Katz, Secretary
Securities and Exchange Commission
450 Fifth Street, NW
Washington, DC 20549-0609

57-06-04

Re: SEC Proposal on Point of Sale and Confirmation Disclosures

Dear Mr. Katz:

One of my challenges in designing and recommending investments for clients is to present the information as clearly as possible in order for the client to be able to make decisions, ask questions, give feedback or request changes. With each new form that is added to the array of papers required to consummate transactions, obfuscation results rather than clarity for the investor. I do present the details and the fees relevant to each asset class in a mutual fund to investors so that they can choose which class they prefer. Prospectuses lay them out well. Adding legal forms to this process will not suddenly enable investors to realize and comprehend the intricacies of the investments if they are not grasping it now. I believe that the SEC's proposal on point of sale and confirmation disclosures will add paperwork with no benefit to the investor.

I strive to offer my clients the most appropriate investment vehicles based on an unbiased assessment of their needs. This additional disclosure requirement would affect most of my clients, approximately 200 family units, who currently invest in mutual funds.

Some clients do not understand investments whereas they do understand fees. They should not make decisions based on fees but rather on what their funds are invested in. Only then choose the fee structure associated with that type of investment. If the process is reversed, they are lead to believe they are to choose investments by the lowest fees available. I doubt such an emphasis would result in the portfolio needed to meet their financial goals. I do not want the selection of fee structure to be the defining structure criteria for financial allocation of assets.

Providing the client with a prospectus and using information within it to explain important tenets is a system we are accustomed to utilizing. Making the prospectus easier to understand for investors would be a more useful aid to disclosure and clarification.

Sincerely,

Carole K Morgan
Carole K. Morgan, CFP