

MILLS-PRICE & ASSOCIATES, INC. REGISTERED INVESTMENT ADVISOR Financial Planning • Investment Planning

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TODD P. ADAMS, MBA, CFP® President

6710 Winkler Road, Suite 1 Fort Myers, Florida 33919

Mr. Jonathan G. Katz, Secretary Securities and Exchange Commission 450 Fifth Street, NW Washington, DC 20549-0609 April 6, 2005



\$7-06-04

RE: SEC Proposal on Point of Sale and Confirmation Disclosures

Dear Mr. Katz,

As a financial professional for over 20 years, I am concerned about the possible negative impact that the SEC's proposal on point of sale and confirmation disclosures will have on the general investment public.

As an independent financial advisor for the past 15 years, I am able to provide my clients the most appropriate investment products based on an unbiased assessment of their individual needs. The SEC's above referenced proposal I believe would have the unintended consequence of greatly reducing the broad universe of mutual funds and variable annuities that I am now able to offer my clients. This consequence could affect over 1,000 of my clients who currently invest in mutual funds.

I would agree with the SEC that cost is an important factor in making any investment decision but this proposal would lead an investor to believe that the lowest cost product is the most suitable without weighing all the factors that determine suitability.

I can envision in the end that it is the individual investor who will bear the additional cost of implementing this proposal, either through increased fees or a limitation in the number of products offered.

Rather than adopt this proposal which I only see confusing the investment public even further, I would suggest that the SEC re-focus its efforts on compiling important fee information into the prospectus, thus creating a more user-friendly prospectus that would better assist investors in making intelligent investment choices.

Sincerely,

Todd P. Adams