

**LV LORENCE
& VANDER ZWART**

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September 10, 2004

Jonathan G. Katz
Secretary, SEC
450 Fifth St. NW
Washington, DC 20549-0609

RE: File No. S7-25-99

Dear Jonathan:

I am financial professional with nearly 20 years of experience. In 1990, I passed the appropriate tests for the professional designation Certified Financial Planner given by the College of Financial Planning. I have been a member of the Financial Planning Association since the mid-1980s.

Our financial planning firm is compensated by fees and commissions, as my partner and I are registered representatives with a national securities broker dealer. We also own an investment advisory firm registered in our state.

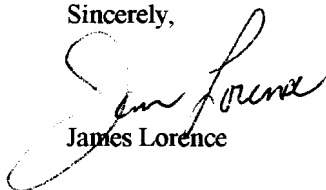
I have been observing the FPA's lobbying efforts that encourage you to withdraw the so-called "Merrill Lynch" exception for the past few years. The firm that I am licensed with does not have a fee-based brokerage investment option for our clients. Our firm is registered as an RIA on the federal level and we do use this option for some of our clients.

Quite frankly, I do not share the FPA's opinion on this issue. Personally, I believe that many in the FPA harbor deep resentment toward investment professionals that are licensed with NYSE or NASD firms and are compensated by commissions. If you examine the leaders of the FPA, you would be hard-pressed to find anyone who holds a securities license. In my humble opinion, the FPA leadership is intimidated by the market share and public recognition that the large broker-dealers have. I have often found their national conventions to be "broker bashing" events. I have not attended in years though I find it ironic that the FPA pleads for corporate sponsorship from the same firms they regularly bash.


The FPA claims in their recent Wall Street Journal advertisement that states "brokers who call themselves financial consultants give investors a false sense of security". Really? Tell that to the clients of my father who is now near age 89. My father has referred to himself as a financial advisor for the past 44 years while being paid strictly by commissions. Incidentally, he has never had a customer complaint.

My conclusion is that this is a case of "sour grapes". The FPA leadership speaks for a few disgruntled fee-only advisors who do not want to do what is necessary to build their own practices. The FPA's answer is to level the playing field.

Sincerely,


James Lorence

Jim Lorence and Ryan Vander Zwart are Certified Financial Planner™ Practitioners.

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