

**Government of the District of Columbia**  
**Department of Insurance, Securities and Banking**

Lawrence H. Mirel  
Commissioner



**February 8, 2005**

***VIA FIRST CLASS MAIL***

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

Re: Proposed Rule For Certain Broker-Dealers Deemed Not To Be Investment Advisers  
S.E.C. File Number S7-25-99

Dear Mr. Katz:

The Securities Bureau (the "Bureau") of the District of Columbia's Department of Insurance, Securities and Banking requests a ten (10)-calendar-day extension to comment on the Proposed Rule for Certain Broker-Dealers Deemed Not To Be Investment Advisers (hereinafter, the "Reproposal"). In view of the voluminous nature of the Reproposal and the significant impact the Reproposal once finalized would have on securities professionals and investors in the District of Columbia, as well as other jurisdictions, we respectfully request this brief extension to respond to the invitation for comments on the Reproposal.

If you have any questions regarding this request, please feel free to call me at 202/442.7800 or J. Barron Knight, Assistant Director, at 202/442.4794. Thank you in advance.

Yours truly,

Theodore A. Miles  
Director, Securities Bureau

cc: Rex Staples, Esquire (VIA ELECTRONIC MAIL [rs@nasaa.org](mailto:rs@nasaa.org))  
Jennifer L. Sawin, Esquire (VIA ELECTRONIC MAIL [SawinJ@SEC.GOV](mailto:SawinJ@SEC.GOV))