March 29, 2005

Jonathan G. Katz, Secretary
Securities and Exchange Commission
450 Fifth Street, NW
Washington, DC 20549-0609
Re: File No. S7-06-04

Dear Secretary Katz,

I am a licensed insurance professional and variable products salesperson. I am writing to you because the new disclosure requirements contained in the SEC's proposal regarding the sale of mutual funds and variable products are unnecessary and will provide no meaningful additional protection to consumers. In addition,**I feel all the regulations being added and proposed of late only serve to increase the cost of doing business which in turn forces advisors to either increase fees to clients or pass on advising/helping the little guy.**

Mutual fund and variable annuity prospectuses, which are reviewed by the SEC, already discuss the fees, risks and expenses associated with the purchase of these products. Very recently, in 2002, the SEC took steps to simplify the contents of the prospectus. If you feel there are additional issues regarding the contents of the prospectus, focus your efforts on further revisions to the prospectus requirements; if you still believe consumers should be given a "one-pager," the appropriate document would be the table of fees and expenses found in every prospectus. Requiring a new, separate disclosure document at the point of sale and at confirmation would duplicate information already found in the prospectus, create confusion as yet another document is thrown into the mix, and reduce the likelihood that consumers will read the most important source of information on the product -- the prospectus. Instead, the SEC should focus its efforts on getting consumers to carefully read the prospectus they receive. **Those of us who have always conducted ethical practice are being forced to stop helping the little guy due to the time and expense this regulation requires.I have always sat and discussed the fees and charges with my clients. I also have disclosed my compensation in the belief that they can then place value on the time I spend and the advise they receive. I am rewarded by long term relationships and referrals and no need to make cold calls of any kind.**

Finally, a disclosure that only discusses an investment's fees and expenses will lead people to focus on the investment's costs rather than its overall returns. After all, which is the better investment -- one with low costs and a net annual return of 2 percent, or an investment with twice the expenses and a net annual return of 6 percent?

For these reasons, I urge the NASD withdraw the proposed rule.

Thank you for your consideration of my views on this matter.

David T. Wilson