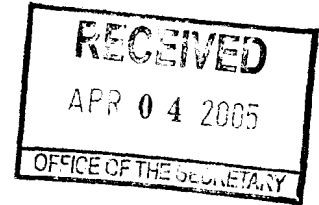




Insurance & Investments Since 1952

1142



March 30, 2005

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

ST-06-04

Re: SEC Proposal on Point of Sale and Confirmation Disclosures

Dear Mr. Katz:

I have been a financial professional for over 20 years, and I am concerned about the potential negative impact that the SEC's proposal on point of sale and confirmation disclosures will have for my clients.

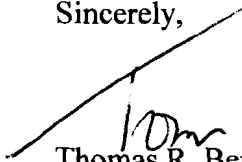
As an independent financial advisor, I am able to offer my clients the most appropriate investment vehicles based on an unbiased assessment of their needs. The SEC point of sale disclosure system, as proposed, would have the unintended consequence of substantially limiting the broad universe of mutual funds and variable annuities that I am now able to offer my clients.

Additionally, while cost is an important factor in any investment decision, this proposal misleads investors into believing that the lowest cost product is the most suitable versus encouraging investors to weigh all factors of suitability.

Subsequently, it will be the individual investor who will ultimately pay the added cost of implementing this proposal, either through increased fees or a limitation of products offered.

Rather than adopt the current proposal, I would urge the SEC to re-focus its efforts on incorporating important fee information into the prospectus and in turn, creating a more user-friendly prospectus that would better aid investors in their decision making process.

Sincerely,


Thomas R. Berry

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