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OFFICE OF THE SECRETARY

March 31, 2005

Jonathan G. Katz, Secretary Security and Exchange Commission 450 5th Street NW Washington, DC 20549-0609

RE: File Number: S7-06-04

Dear Jonathan:

Kevin D. Frost, CLU, ChFC Financial Representative

104 E Walnut St PO Box 9 Herrin, IL 62948 618 988 8080 office 618 988 8508 fax kevin.frost@nmfn.com

As a licensed insurance and financial professional who spends a great deal of time working with variable products, I am concerned about the new disclosure requirements proposed by the SEC regarding the sale of mutual funds and variable products. I believe these new disclosure requirements are unnecessary and provide no meaningful additional protection to consumers.

Financial professionals are currently required to provide clients with prospectuses when discussing mutual funds and variable products. These prospectuses are presently reviewed by the SEC and discuss the fees, risks and expenses which are associated with the purchase of these products. Recently the description of these issues were simplified within the prospectuses to make them easier for consumers to review. I would suggest that if further clarification of these descriptions needs to be made that they be pursued as soon as possible. Further clarification and description could be included in the current prospectus presently provided.

To ask our clients to include another document in an already confusing process only creates further disincentive for clients to pursue saving for their long term goals. In today's environment, the process of opening an account and selling a variable product is already time consuming and requires a number of signatures on a variety of documents. An additional step further complicates this process. Additional information only increases the likelihood that consumers will disregard the massive amounts of information currently provided to them at the time of sale.

The SEC's efforts may be better spent on encouraging consumers to more thoroughly review the current prospectus already provided.

We currently live in an environment where too fee people adequately save for their own retirement. These proposed regulations will further discourage consumers from taking necessary steps to ensure their own future financial security.

For these reasons I urge you to withdraw the proposed rule for future consideration.

Thank you for your time and consideration on this matter.

Cordially.

Kevin D Frost, CLU, ChFC

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