

March 26, 2004

To Whom It May Concern:

Re: File Number S7-14-04; Mandated Electronic Filing For Form ID

Command Financial Press appreciates the opportunity to respond to the request for comments on the proposed rule and form changes. Electronic filing for Form ID can certainly facilitate more efficient transmission and processing of required information, but as presented in the proposed rule, some of the amendments actually contradict this intended effect and others are in need of greater clarification. The proposal also seems on the one hand to want to simplify the process for individual self-filers, such as the introduction of user-chosen passphrases, yet introduces new requirements better suited for corporate entities, such as certificates from certification authorities.

The current process of faxing in the Form ID requires no verification. The proposed requirement to supplement the electronic Form ID with additional verification by fax is superfluous and negates the benefits of speed, efficiency and accuracy obtained by electronic filing. The necessity to match up and compare electronic filings with their faxed counterparts will require greater labor and file management by Filer Support, making them less available for support in other areas.

- The proposed faxed notarized document would not be an effective safeguard in authenticating an electronically filed Form ID in that an individual intent on fraudulently obtaining EDGAR access codes could appear before a notary public under the character reference of another individual known to the notary, and without presenting identification, sign the document. The notary would merely be witnessing the signing of the document by that individual. The proposed requirement to notarize the document would do little to ensure authenticity, but would be a burden to new filers in adding more time and effort to the process of obtaining codes.
- Foreign applicants in different time zones would be under additional pressure to coordinate the electronic filing, notarization and faxing of their document. It is not clear what the hours of operation for the on-line site would be, nor is it clear whether the faxed document would have to be received and matched up with the electronic filing prior to release of codes. There is also the question of whether the concept of 'notarized' documents is equivalent for all countries.
- The procedure regarding certificates needs clarification. The proposal states that eventually the fax procedure will be replaced with a requirement that applicants use a certificate from a certification authority to authenticate Form ID filings. Footnote 24 indicates that certificates are currently optional for filing on EDGAR, but the EDGAR 8.6m Release Notes states that the option to use a certificate during login to FilerWeb has been removed. The EDGAR filer manual, however, indicates that once a certificate is activated for a CIK, it must continue to be used whenever logging into EDGAR.

Hardship exemptions should be allowed for paper filing via fax of Form ID in situations where codes are needed for an imminent filing and the applicant's Internet access is not available.

Additional comments:

- Receipt of codes - Access codes applied for via electronic filing should be returned online prior to the end of the application session after all necessary verification and system checks, such as whether an applicant has already received access codes. Ideally, codes would be returned within minutes of application and in a print-friendly format.
- Syntax - naming conventions such as abbreviations and deletion of punctuation should be automatically adjusted and displayed upon entry of data into the online form.

- Passphrase system – Until further details are provided, such as whether the passphrase would eliminate one or two of the other codes (password, PMAC) it seems that rather than simplifying the procedure, the addition of yet another code adds an additional layer. There is also a security concern regarding the passphrase if there is no expiration date for it.
- Serial filers – will entities for which a CIK and filer number are currently being generated through the serial tag continue to have to file a Form ID to obtain their CCC, password and PMAC, and if not, what will the procedure be for serial filers.
- Filing Agents – Given the technical difficulties new filers may encounter, and the fact that a great many filers already rely on the services of filing agents to submit their filings to the SEC, consideration should be given to the possibility of allowing filing agents, with a power of attorney, to electronically submit Form ID on behalf of their clients.

Thank you again for this opportunity to comment. I can be reached via email or at the telephone number indicated below should you wish to contact me.

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