11834 Sherbrook Drive Baton Rouge, LA 70815 May 20, 2004

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



57-11-04

Dear Mr. Katz:

REF: Proposed Rule: Mandatory Redemption Fees for Redeemable Fund Securities

- 1. As a licensed limited securities representative, I am **in favor** of imposing high fees on redemptions made within five days of purchase.
- 2. I suggest that the SEC allow companies to charge redemption fees above 2% at their option, with 2% as a mandatory minimum. Companies should be allowed to set up a tiered fee structure above the 2% floor.
- 3. An issue which greatly concerns me, however, is how would purchases avoid penalties if purchased shares are immediately reversed due to problems such as non-clearance of funds or defective paperwork?

For example, several years ago a relative purchased a sizeable number of mutual fund shares (\$100,000+) from another representative who submitted the application before the bank cleared the deposit. Although the deposit eventually cleared, the first transaction had to be reversed and a second entered later. The first transaction had the appearance of an immediate sale.

Would that type of situation incur the 2% "immediate redemption" penalty under the proposed rules?

I recommend that the proposed rules not penalize investors who reverse a transaction within five days due to processing errors or procedural complications.

Thank you.

Riley J. Furr