Investor Advocacy: Comment Letters on SEC Rule Proposals (role: mix of primary author, co-author, or editor):

- Letter from Fund Democracy and the Consumer Federation of America commenting on SEC money market fund reforms (Sep. 8, 2009)
- Letter from Fund Democracy and Consumer Federation of America to Securities and Exchange Commission in support of proposal regulate equity-indexed annuities as securities under the federal securities laws (Sep. 10, 2008)
- Letter from Fund Democracy and Consumer Federation of America commenting on SEC proposal to eliminate NRSRO rating requirement from money market fund rule (Sep. 5, 2008)
- Letter from Fund Democracy and the Consumer Federation of America providing supplemental comments on SEC’s proposal to permit mutual funds to use a summary prospectus to satisfy their prospectus delivery requirements (Apr. 17, 2008)
- Letter from Fund Democracy, Consumer Federation of America and Consumer Action commenting on SEC’s proposed exemption from principal trading restrictions under the Investment Advisers Act (Nov. 30, 2007)
- Letter from Fund Democracy and Consumer Federation of America commenting on SEC repropose of rule relating to broker exclusion from the definition of investment adviser (Nov. 2, 2007)
- Letter from Fund Democracy and Consumer Federation of America economic studies of proposal to require 75% independent fund boards and independent chairmen (Mar. 2, 2007)
- Letter from Fund Democracy and Consumer Federation of America noting significance of BISYS enforcement action for SEC proposal to require 75% independent fund boards and independent chairmen (Oct. 18, 2006)
- Letter from Fund Democracy and Consumer Federation of America commenting on SEC proposal to require 75% independent fund boards and independent chairmen (Aug. 1, 2005)
- Letter from Fund Democracy and Consumer Federation of America commenting on SEC request for proposals to study broker and investment adviser regulation (July 19, 2006)
- Letter from Fund Democracy, Consumer Federation of America, Consumers Union, AARP and Consumer Action urging SEC to request comments on the costs of compliance with the independent chairman/75% independent board rule (Apr. 18, 2006)
- Letter from Fund Democracy and Consumer Federation of America regarding SEC staff interpretive letter on broker exemption (Feb. 15, 2006)
- Comment letter from Fund Democracy and Consumer Federation of America regarding SEC interpretive release on soft dollar safe harbor (Nov. 23, 2005)
- Comment Letter from Fund Democracy, Consumer Federation of America, Consumers Union and Consumer Action responding to requests from Securities Industry Association and American Council of Life Insurers to delay compliance with broker exemption (Aug. 11, 2005)
- Comment Letter from Fund Democracy, Consumer Federation of America, Consumers Union and Consumer Action responding to the SEC’s request for further comment on point-of-sale document proposal (Apr. 5, 2005)
- Comment Letter from Fund Democracy, Consumer Federation of America, Consumer Action and Consumers Union on SEC proposal to exempt certain fee-based brokers from adviser regulation (Feb. 7, 2005)
• Comment letter from Fund Democracy and Consumer Federation of America on SEC proposal to require most mutual funds to impose a 2% redemption fee on shares sold within 5 days of purchase (May 11, 2004)
• Comment Letter from Fund Democracy, Consumer Federation of America, Consumer Action and Consumers Union on SEC proposal regarding mutual funds' use of brokerage commissions to finance distribution (May 10, 2004)
• Comment Letter by Fund Democracy and Consumer Federation of America on SEC proposal regarding disclosure of the basis of mutual fund boards' approval of the advisory contract (Apr. 26, 2004)
• Comment Letter from Fund Democracy, Consumer Federation of America, Consumer Action and Consumers Union on SEC proposal regarding fee disclosure in mutual fund point-of-sale and confirmation documents (Apr. 21, 2004)
• Comment Letter from Fund Democracy, Consumer Federation of America, Consumer Action and Consumers Union on SEC request for comments on measures to improve disclosure of mutual fund portfolio transaction costs (Mar. 16, 2004)
• Comment letter from Fund Democracy, Consumer Federation of America, Consumer Action, Consumers Union and Public Citizen on SEC proposal regarding investment company governance (Mar. 10, 2004)
• Comment Letter from Fund Democracy and Consumer Federation of America on SEC proposal regarding improving disclosure of mutual fund commission breakpoints (Feb. 12, 2004)
• Comment Letter from Fund Democracy and Consumer Federation of America on SEC proposal to require receipt of fund orders no later than the time the fund is priced (Feb. 6, 2004)
• Comment Letter from Fund Democracy and Consumer Federation of America on SEC proposal regarding advisers acting as subadvisers to mutual funds without shareholder approval (Jan. 8, 2004)
• Comment Letter from Fund Democracy and Consumer Federation of America on SEC proposal regarding mutual fund portfolio and fee disclosure (Feb. 14, 2003)