

Oxford Securities, Inc.
Springfield, Massachusetts

March 28, 1968

Secretary, Securities and Exchange Commission
500 North Capitol Street
Washington, D.C. 20549

Re: Proposed Rule 10b-10

Gentlemen:

Proposed Rule 10b-10 as written, will not benefit the shareholders of Mutual Funds, as evidenced by the reluctance of the New York Stock Exchange, and the Regional Exchanges to accept this proposal.

It is my opinion that this proposed rule, if forced on the Industry, would only further invite "Highly Sophisticated" and "Ingenious Methods" of, skirting the real purpose of this proposed rule.

It is my opinion that "On Balance", the Public would be better served if the New York Stock Exchange alternative be pursued as the only immediate answer to the "Give-up Problem".

Thank you for the opportunity to submit my brief comment.

Very truly yours,

R. W. Cocchi
Vice-President