

Letter of Comment No: File Reference: FSP8524A

January 7, 2005

Lawrence W. Smith Director - Technical Application and Implementation Activities Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

SG Constellation

Re: Proposed FASB Staff Position (FSP EITF 85-24-a), Application of EITF Issue No. 85-24, "Distribution Fees by Distributors of Mutual Funds That Do Not Have a Front-End Sales Charge"

SG Constellation, L.L.C. is pleased to submit the following comments:

We agree with FASB Staff Position FSP EITF 85-24-a.

Also, we applaud the efforts of the FASB Board and Staff during their deliberations on this issue. During one of the FASB Board meetings, one director commented to the effect that "the system works." We heartily concur.

Respectfully submitted,

SG Constellation L.L.C.

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